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CLERK, U.S. DISTRICT COURT  
5/22/18  
CENTRAL DISTRICT OF CALIFORNIA  
BY: **CS** DEPUTY

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14 **UNITED STATES DISTRICT COURT**  
15 **CENTRAL DISTRICT OF CALIFORNIA**  
16 **WESTERN DIVISION**

17 **SECURITIES AND EXCHANGE**  
18 **COMMISSION,**

19 **Plaintiff,**

20 **vs.**

21 **TITANIUM BLOCKCHAIN**  
22 **INFRASTRUCTURE SERVICES,**  
23 **INC.; EHI INTERNETWORK AND**  
24 **SYSTEMS MANAGEMENT, INC.**  
25 **aka EHI-INSM, INC.; and MICHAEL**  
**STOLLAIRE,**

26 **Defendants.**

Case No. **CV18-4315-DSF(JPRx)**  
**DECLARATION OF SARAH GIST**

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**DECLARATION OF SARAH GIST**

I, **Sarah Gist**, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am employed by Microsoft Corporation (“Microsoft”) as one of Microsoft Corporation’s Record Custodians, **Senior Paralegal**, I have personal knowledge of the matters set forth below and, if called as a witness, would testify to these facts under oath.

2. I make this declaration at the request of the United States Securities and Exchange Commission (“SEC”).

3. I am one of the records custodians for Microsoft Corporation. I am generally familiar with the electronic filing system for maintaining records for companies that partner with Microsoft and provide services to, or on behalf of, Microsoft.

4. In the ordinary course of Microsoft’s business, the company maintains electronic records of companies that partner with Microsoft and provide services to or on behalf of Microsoft. These records are made at the time that a partner company enters into a contract to provide services to, or on behalf of, Microsoft.

5. In the ordinary course of Microsoft’s business, the company maintains an electronic record of certain documents with respect to contracts with companies that partner with Microsoft by providing services to, or on behalf of, Microsoft. These records are made contemporaneously with the events that they document. These records are kept in Microsoft’s systems for a limited time and may not be available as they are deleted in the course of routine document storage maintenance as prescribed by the company’s record retention policy.

6. On or about February 8, 2018, the SEC requested that Microsoft provide it with certain information concerning companies called Titanium Blockchain Infrastructure Services, Inc. (“TBIS”) and EHI Internetwork and Systems

1 Management, Inc. (“EHI”), and an individual named Michael Stollaire aka Michael  
2 Stollery or Michael Stoller (“Stollaire”).

3 7. In response to the SEC’s request, and at my direction, Microsoft  
4 personnel reviewed the books, records, files, and computer systems of the business  
5 units within Microsoft that might reasonably be expected to have or to have had any  
6 type of business relationship with TBIS or EHI or Stollaire including as a customer,  
7 client, vendor, employee, contractor, consultant, or other type of business transaction.

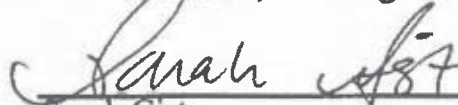
8 8. Subject to Microsoft’s document retention policy, Microsoft’s books and  
9 records are current as of the date of this declaration. The search of these materials  
10 has not disclosed any current or past business relationship of any kind between  
11 Microsoft and TBIS or EHI.

12 9. The search of these materials indicates that Microsoft used a third-party  
13 contractor to provide certain information technology (“IT”) consulting services for  
14 Microsoft and Michael Stollery worked as an independent contractor on those IT  
15 services between February 6, 2013 and December 8, 2014.

16 10. Microsoft did not locate any documents that indicate that Microsoft has  
17 authorized TBIS or EHI or Stollaire/Stollery to use Microsoft’s name or logo in their  
18 marketing or advertising or for any other purpose.

19 I declare under penalty of perjury under the laws of the United States of  
20 America that the foregoing is true and correct.

21 Executed this 19<sup>th</sup> day of March, 2018 at Redmond, Washington.

22   
23 Sarah Gist