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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 KAY B. LEE

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1 **DECLARATION OF KAY B. LEE**

2 I, Kay B. Lee, declare, pursuant to 28 U.S.C. § 1746, as follows:

3 1. I am employed by Hewlett Packard Enterprise Company (“HPE”) as its
4 Investigations Counsel. I have personal knowledge of the matters set forth below
5 and, if called as a witness, would testify to these facts under oath.

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

8 3. HPE is a multi-national enterprise technology company based in Palo
9 Alto, California. On November 1, 2015, HP Inc., formerly known as Hewlett-
10 Packard Company, spun-off HPE. HPE has operated as a stand-alone company since
11 that date.

12 4. On or about February 6, 2018, the SEC requested that HPE provide it
13 with certain information concerning companies called Titanium Blockchain
14 Infrastructure Services, Inc. (“TBIS”) and EHI Internetwork and Systems
15 Management, Inc. (“EHI”), and an individual named Michael Stollery aka Michael
16 Stollaire (“Stollaire”).

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

22 6. HPE keeps and maintains business records in the course of its
23 transactions and regularly conducted activities as a regular practice. It is HPE’s
24 practice to prepare such records at or near the time of the occurrence of the matters
25 set forth by, or from information transmitted by, a person with knowledge of those
26 matters. HPE maintains books and records of entities and persons with which it has
27 contracts, agreements, and/or other substantive business relationships, such the
28 purchase and sale of a product or service, making an investment, or entering into an

1 alliance or partnership, including authorized uses by third parties of its trade name,
2 trademarks, and service marks. HPE also maintains books and records of entities and
3 persons with which it has engaged as an employee, vendor, contractor, or consultant.

4 7. The search of HPE's books and records has not disclosed any business
5 relationship of any kind between HPE and TBIS or Stollaire from November 1, 2015
6 through the date of this declaration.

7 8. The search of these materials has not disclosed that HPE has authorized
8 TBIS or Stollaire to use HPE's name or logo in TBIS's marketing or advertising.
9 Given that the HPE name and logo are the intellectual property of the company, HPE
10 considers a third-party's unauthorized use of the HPE name or logo in marketing or
11 advertising as an infringement of its intellectual property.

12 9. The search of these materials indicates that EHI has registered for and
13 entered into a Partner Agreement with HPE as a value added reseller. The agreement
14 with EHI was entered into on or about March 7, 2014, and is active as of this date.
15 Approximately 12,000 entities currently have a Partner Agreement with HPE to resell
16 commercially available HPE products and services to end-customers. Contracted
17 entities must electronically accept HPE's terms and conditions to participate in the
18 program. Companies with a current Partner Agreement have a limited right to
19 display HPE's trademarks solely to promote their authorized resale of HPE's
20 products and services.

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

23 Executed this 26th day of April, 2018 at Wayne, Pennsylvania.

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25 
26 _____
27 Kay B. Lee
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