

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ELSEVIER INC., ELSEVIER B.V., ELSEVIER
LTD.

Plaintiffs,

v.

SCI-HUB d/b/a WWW.SCI-HUB.ORG, THE
LIBRARY GENESIS PROJECT d/b/a
LIBGEN.ORG, ALEXANDRA ELBAKYAN,
JOHN DOES 1-99,

Defendants.

Index No. 15-cv-4282 (RWS)

FILED UNDER SEAL

**[REDACTED] DECLARATION OF ANTHONY WOLTERMANN IN SUPPORT OF
PLAINTIFFS' APPLICATION AN ORDER AUTHORIZING ALTERNATIVE SERVICE
OF PROCESS ON DEFENDANTS AND FOR PRELIMINARY INJUNCTION**

I, ANTHONY WOLTERMANN, declare as follows:

1. I submit this declaration in support of Plaintiffs' application for an order authorizing alternative service of process and for a preliminary injunction.
2. I am a Technology Infrastructure and Operations Manager at Elsevier Inc. My office is located at 9443 Springboro Pike, Miamisburg, Ohio 45342, Office 61 41.
3. I have worked for the Reed Elsevier group of companies for 20 years. For the last 11 years, I have worked specifically for Elsevier Inc. ("Elsevier").

A. Elsevier's ScienceDirect Platform

4. Elsevier B.V. owns and operates ScienceDirect: a subscription database accessible at www.sciencedirect.com. A true and correct screenshot of the ScienceDirect homepage is attached hereto as Exhibit A.

5. Through ScienceDirect, Elsevier provides its subscribers access to its database of scientific journal articles and book chapters. In most cases, the copyright in the content available through ScienceDirect is owned by Elsevier B.V., Elsevier Inc., or Elsevier Ltd. ScienceDirect users may purchase individual journal articles or book chapters through ScienceDirect for prices typically ranging from \$19.95 to \$41.95 for journal articles and \$31.50 for most book chapters.

6. Educational institutions, and specifically research universities, are significant subscribers to ScienceDirect. Through their institutional subscriptions, universities are able to provide their students and faculty access to ScienceDirect.

7. Among the institutional subscribers to ScienceDirect are Columbia University, Fordham University, and New York University, each of which is physically located, and maintains computer networks, in the Southern District of New York.

8. The content available through ScienceDirect – *i.e.*, scientific journal articles and book chapters – is physically housed on servers operated by Akamai Technologies, Inc. Akamai is a cloud service provider with data centers and “edge servers” located throughout the world, including at least one data center in the Southern District of New York.

9. Akamai operates a proprietary distributed cache network known as the “Akamai Intelligent Platform.” This process serves cached copies of content maintained in the Akamai cloud, including Elsevier's copyrighted material in ScienceDirect, by way of particular Akamai edge servers that are geographically close to the user. A user that accesses copyrighted works in

ScienceDirect from a university located in the Southern District of New York will likely receive content that originates from Akamai's edge servers also located in the Southern District of New York.

B. Remote Access to ScienceDirect

10. To best serve the usage needs of its community of scholars and researchers, including their need to access information remotely (for example, while traveling, on sabbatical or otherwise off-campus), Elsevier provides university students and faculty remote access to ScienceDirect authenticated through their university systems. In effect, this means that Elsevier allows university students and faculty to access ScienceDirect by authenticating access via credentials issued by their university, rather than with ScienceDirect. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11. Educational users may authenticate their computers' access to ScienceDirect and obtain an authorization token when connected to a subscribing university's computer network. An authorization token is an encrypted "cookie," issued by ScienceDirect and stored on the user's computer. [REDACTED]

[REDACTED] Once the authorization token has expired, the user will have to re-authenticate his access in order to obtain a new authentication token.

12. When a user's request for access originates within the IP address range of an authorized university licensee (*i.e.*, on the university's computer network), ScienceDirect will

perform authentication based on that university IP address and subsequently issue an authorization token to the user.

13. Remote users can typically access ScienceDirect in two manners. In the first of these methods, a university will operate a “proxy” service which allows students and faculty members to use university-provided access credentials to log into the university’s computer network from a remote location. In effect, when a remote computer is connected to a university computer network through a proxy service, that computer is for all intents and purposes part of that network. A critical consequence of this practice is that from the perspective of a third-party Internet-based service like ScienceDirect, the remote computer will appear to be located at the IP address of the university operating the proxy service. For example, if a student at Columbia University is on vacation in France and accesses the Columbia computer network through a proxy service, when that student then visits an Internet-based service such as ScienceDirect, his location (as determined by IP Address) will appear to be Columbia University and its IP address, rather than France. A figure detailing this connection method is attached hereto as Exhibit B.

14. In the second method, the remote user connects to a university network (either on-site or remotely through a proxy) in order to obtain an authorization token. Once the authorization token is obtained, the user can connect directly to ScienceDirect from any location, including those outside the university computer network. Notably, unlike in the proxy connection method, a remote user who connects to ScienceDirect in this manner will not pass his browsing activity on ScienceDirect through a university computer system. A figure detailing this connection method is attached hereto as Exhibit C.

C. The Library Genesis Project

15. The Library Genesis Project is an illegal online repository of copyrighted works, including scientific articles and book chapters legally available on the ScienceDirect platform. The Library Genesis Project maintains a website at the URL “libgen.org,” and an alternative domain at “libgen.in.” A true and correct screenshot of the Library Genesis Project’s home page, as retrieved April 2, 2015, is attached hereto as Exhibit D.

16. I have personally reviewed the content of the Library Genesis Project’s website as part of Elsevier’s ongoing efforts to prevent the ongoing infringement of the copyrights in scientific journal articles and book chapters accessible through ScienceDirect. To my knowledge, the Library Genesis Project is the single largest repository of pirated scientific content Elsevier has ever encountered.

17. As of April 2, 2015, the URL libgen.org directs to a server with the IP address 93.174.95.71. This IP address is assigned to Ecatel Ltd., in Amsterdam, the Netherlands. A true and correct copy of the WHOIS record for libgen.org, retrieved April 2, 2015, is attached hereto as Exhibit E.

18. The Library Genesis Project’s home page contains a search box with options to search by keyword, Title, Author, Series, Periodical, Publisher, Year, ISBN, and other fields. Users may also opt to search different types of materials, including “LibGen (Sci-Tech)” and “Scientific articles.”

19. “LibGen (Sci-Tech),” which refers to scientific and technical books, is the default setting for a search on libgen.org. Above the search box is displayed the text “Library Genesis” followed by the superscript “1M.” I believe that the superscript “1M” indicates that the “LibGen (Sci-Tech)” repository contains approximately 1 million pirated books.

20. If a user clicks on “Scientific articles” on the libgen.org home page, he is directed to “libgen.org/scimag,” a search page which permits users to search by Digital Object Identifier (“DOI”), PubMed ID,¹ or Author and Article. A user may also search by journal title, ISSN, Volume or Year of Publication, Issue Number, and Page Number. Above the search box is displayed the text “Library Genesis: Scientific Articles” followed by the superscript “40M.” I believe that the superscript “38M” indicates that the Library Genesis Project’s repository contains approximately 40 million pirated scientific articles. A true and correct screenshot of the web page “libgen.org/scimag,” retrieved June 10, 2015, is attached hereto as Exhibit F.

21. The Library Genesis Project’s repository appears to contain a substantial majority of all of the scientific journal articles Elsevier publishes and makes available through ScienceDirect. In the course of my investigation of the libgen.org website, I found it difficult to locate a ScienceDirect-hosted article which was not illegally available through the Library Genesis Project’s repository.

22. In order to facilitate the creation of “mirrors” of the libgen.org website which perpetrate and extend the volume and availability of the millions of pirated articles available on the site, the Library Genesis Project allows users to download search databases containing bibliographic information concerning the works in the Library Genesis Project repository. On or about March 17, 2015, Elsevier downloaded copies of the “LibGen (Sci-Tech)” and “Library Genesis: Scientific Articles” databases. I and other Elsevier officials then analyzed these databases to determine how many Elsevier-published works are contained in the Library Genesis Project repository.

¹ Digital Object Identifiers and PubMed IDs are unique identification codes which specify a particular publication.

23. Elsevier's analysis of the "LibGen (Sci-Tech)" bibliographic database indicates that the Library Genesis Project repository contains more than 29,000 Elsevier imprint book titles. Elsevier's analysis of the "Library Genesis; Scientific Articles" database indicates that the Library Genesis Project repository contains approximately 12 million articles associated with Elsevier branding. Attached hereto as Exhibit G is a table detailing Elsevier's analysis of the Elsevier-published works contained in the Library Genesis Project bibliographic database.

24. Based on my review of a sampling of these search results, a substantial number, if not nearly all, of the Elsevier-published books and journal articles contained in the Library Genesis Project repository are Elsevier's copyrighted works. Elsevier has not authorized the Library Genesis Project to distribute any of Elsevier's works.

25. The bibliographic database of scientific journal articles also contains data concerning the date upon which each document was added to the Library Genesis Project repository. From this data, I have been able to determine the rate at which new articles are added to the repository. Based on my analysis of this ingestion rate over a recent one month span, the Library Genesis Project obtains an average of approximately 3,500 new Elsevier-published scientific articles each day. Attached hereto as Exhibit H is a table showing the number of new articles added to the Library Genesis Project's "Scientific Articles" repository each day for the period beginning January 21, 2015, and ending February 20, 2015.

26. Notably, below the search box on the Library Genesis Project's scientific articles page is the statement "if file not found – redirect to sci-hub.org." To test this connection, I searched for "xxxxxxx" (gibberish text intended to yield no results in the Library Genesis Project repository) and was redirected to Sci-Hub's proxied Google Scholar search results (as discussed below, paragraph 40) for that text. The webpage displaying results in response to the search for

“xxxxxxx” was “scholar.google.com.sci-hub.org.” A true and correct screenshot of this page is attached hereto as Exhibit I.

27. Libgen.org encourages its users to contribute pirated works to the Library Genesis Project repository. Through links accessible through the “Upload” dropdown on its main page, the Library Genesis Project provides instructions to its users on how to upload content to the repository by FTP or through dedicated online tools such as “Libgen Uploader” and “Sci Articles Uploader.” Each of these tools requires a password distributed through the Library Genesis Project’s dedicated online forum at genofond.org. A true and correct screenshot of these instructions is attached hereto as Exhibit J.

28. I am aware that The Library Genesis Project derives revenue from its infringing activities through donations, which it accepts via BitCoin.

29. Based on my review of the Library Genesis Project’s website, I believe that the Project is dedicated substantially, if not nearly exclusively, to the piracy of copyrighted works.

30. In addition to the Library Genesis Project domains discussed above, a number of websites hosted at other domains appear to mirror the functionality of libgen.org. Among these “mirror” sites are “elibgen.org,” “libgen.info,” and “lib.estrorecollege.org.” These URLs redirect to freescienceengineering.library.elibgen.org, which provides substantially identical functionality as does the “LibGen (Sci-Tech)” repository on libgen.org, including the ability to search for and download pirated scientific books. True and correct screenshots of the freescienceengineering.library.elibgen.org home page, retrieved April 2, 2015, and June 10, 2015, are attached hereto as Exhibit K. The site “bookfi.org” also appears to duplicate the function of the “LibGen (Sci-Tech)” repository, including the ability to search for and download pirated scientific books. In some cases, the Library Genesis Project encourages its users to visit

these mirror sites. A true and correct screenshot showing links from libgen.org to such mirror sites is attached hereto as Exhibit L.

31. As of April 2, 2015, the URL elibgen.org directs to a server with the IP address 46.32.68.138. This IP address is assigned to AS Information Network, LLC., in Saint Petersburg, Russia. A true and correct copy of the WHOIS record for elibgen.org, retrieved April 2, 2015, is attached hereto as Exhibit M.

32. As of April 2, 2015, the URL libgen.info directs to a server with the IP address 46.32.68.138. This IP address is assigned to AS Information Network, LLC., in Saint Petersburg, Russia. A true and correct copy of the WHOIS record for libgen.info, retrieved April 2, 2015, is attached hereto as Exhibit N.

33. A true and correct copy of the WHOIS record for estrorecollege.org, retrieved April 2, 2015, is attached hereto as Exhibit O.

34. As noted above, a visitor to elibgen.org, libgen.info, or lib.estrorecollege.org is redirected to “freescienceengineering.library.elibgen.org,” (at the IP address 46.32.68.138) which previously explicitly stated its connection to the Library Genesis Project. Specifically, the elibgen.org site displays, on its home page, the text “You are in the Library Genesis 1M online library.” It is unclear whether the elibgen.org website or the other websites which redirect to it are operated by the Library Genesis Project or by other unknown Doe Defendants acting in concert with the Library Genesis Project.

35. A true and correct copy of the bookfi.org homepage, retrieved April 10, 2015, is attached hereto as Exhibit P.

36. As of April 14, 2015, the URL bookfi.org directs to a server with the IP address 104.28.12.85. This IP address is assigned to Cloudflare, Inc. in Phoenix, Arizona. A true and

correct copy of the WHOIS record for Bookfi.org, retrieved June 10, 2015, is attached hereto as Exhibit Q.

D. Sci-Hub's Infringing Activities

37. When Elsevier became aware of the website Sci-Hub.org, which appeared to enable its users illegal access to millions of scientific articles provided by multiple journal services, including ScienceDirect, Elsevier began an investigation into Sci-Hub. The investigation was extraordinarily difficult because, like many illegal internet operations, the Defendants go to great lengths to conceal from the publishers (and law enforcement) details about their activities to procure copyrighted content, their locations, and the technical means by which they carry out their schemes. Among other techniques, Sci-Hub has periodically blocked access to its website from IP addresses associated with the United States and the Netherlands: two countries with which Elsevier is closely associated.

38. I have personally reviewed the content of the Sci-Hub website as part of Elsevier's ongoing efforts to prevent Sci-Hub's ongoing infringement of the copyrights in scientific journal articles and book chapters accessible through ScienceDirect.

39. As of April 2, 2015, the URL sci-hub.org directs to a server with the IP address 31.184.194.81. This IP address is assigned to Petersburg Internet Network Ltd., in Saint Petersburg, Russia. A true and correct copy of the WHOIS record for Sci-Hub.org, retrieved April 2, 2015, is attached hereto as Exhibit R.

40. The Sci-Hub home page contains a search box which allows users to search for scientific publications based on a number of criteria, including keywords, Digital Object Identifier, PubMed Identifier, and source URL. A true and correct screenshot of the Sci-Hub home page, retrieved April 2, 2015, is attached hereto as Exhibit S.

41. When a user performs a keyword search on Sci-Hub, the website returns a proxied version of search results for the entered keywords from the Google Scholar search database.² The URL of these proxied results is scholar.google.com.sci-hub.org. A true and correct screenshot of the results from a sample keyword search result, performed April 2, 2015, is attached hereto as Exhibit T.

42. When a user selects a ScienceDirect-hosted search result from the proxied Google Scholar results, Sci-Hub will provide the user access to the requested article. Specifically, Sci-Hub will redirect the user to a proxied version of ScienceDirect. Because this connection is made either through an authorized university's network or using a misappropriated authorization token, the user will be presented a link through which he may download the requested content in PDF or HTML format at no charge. A true and correct screenshot of a proxied ScienceDirect page is attached hereto as Exhibit U.

43. Outside the illegal Sci-Hub scheme, when an unauthenticated guest user visits the ScienceDirect website and accesses this page, the "download PDF" link shown in the proxied version of the ScienceDirect page (as depicted in Exhibit S) instead provides a link allowing the user to purchase the requested article. A true and correct copy of the ScienceDirect page for the article requested in Exhibit U, as seen by an unauthenticated user, is attached hereto as Exhibit V.

44. If, instead of searching for an article by keyword, a Sci-Hub user searches for an Elsevier-published, ScienceDirect-hosted content using a unique identifier (*e.g.*, Digital Object Identifier), the user is redirected directly either to a Library Genesis Project-hosted copy of the

² Google Scholar is a search engine operated by Google and accessible at scholar.google.com, which provides its users the ability to search for research articles, legal cases, and patents. In the case of scientific journal articles, Google Scholar does not ordinarily host the content of the articles, but rather displays only bibliographic information and provides a link to a website where the article may be purchased or viewed.

requested content, if the requested content is already present in the Library Genesis Project's repository, or, if not, to a proxied version of the ScienceDirect page for the content, as described above in paragraph 40.

45. I believe that when a Sci-Hub user requests ScienceDirect-hosted content which is not already stored in the Library Genesis Project's repository, Sci-Hub uploads a copy of the requested content to the Library Genesis repository. Sci-Hub, on its Twitter account, explained the use of the Library Genesis Project repository in this manner, stating that "All downloaded articles are saved on LibGen and downloaded from there after the second request." A true and correct copy of Sci-Hub's February 14, 2013, Twitter posting is attached as Exhibit B to the Declaration of David M. Hirschberg, along with a translation of that post.

46. Based on my review of the Sci-Hub website and the information set forth above, I believe that Sci-Hub serves no other purpose than to facilitate the systematic and rampant infringement of copyrighted content belonging to Elsevier and other scientific publishers.

47. As is the case with the Library Genesis Project, Sci-Hub appears to derive revenue from its infringing activities through user donations. The Sci-Hub "donations" page, accessible at sci-hub.org/donate permits users to donate to the site via credit card, QIWI, and Yandex card2card. A true and correct screenshot of the donations page, retrieved April 1, 2015, along with a translated version of that page, are attached as Exhibit A to the Declaration of David M. Hirschberg.

48. The Sci-Hub donations page also demonstrates the immediacy of the threat Sci-Hub and the Library Genesis Project present to Elsevier and other scientific publishers. I have reviewed a translation of the donations page, which, in explaining why the amount of donations required to run the Sci-Hub website will be lower in the future, states:

It is important to know that these costs will not be recurrent, for two reasons: the first one - additions of articles to the library has been very active (during the last two months, 3.5 million new articles were added, the frequency of loading continuing to rise) - which means that in the future, there will no longer be any need to download most articles through the proxy, but simply from the library. The second reason is that we have been developing our technology which will allow us to operate without a proxy.³

If those statements are to be believed, Sci-Hub is pirating scientific journal articles at a rate of approximately 58,000 articles per day, which is equivalent to one article approximately every one and a half seconds. In addition, because these pirated articles are being archived to the Library Genesis Project's repository, as time goes by, a greater and greater percentage of ScienceDirect's (and all other major scientific publishers') entire corpus of journal articles will have been pirated and transferred to the Library Genesis Project.

49. Elsevier has undertaken substantial effort in its attempts to curtail Sci-Hub's infringing activities. From the time Elsevier learned of Sci-Hub's existence through approximately March, 2014, Sci-Hub's access to ScienceDirect was accomplished largely, if not entirely, through university proxy servers.

50. During the pre-March, 2014 period, I and other Elsevier officials seeking to address this problem examined ScienceDirect access logs in an effort to determine the source of Sci-Hub's intrusions. As a result of these examinations, I was able to identify numerous source IP addresses associated with university computing systems that were likely sources of infringing access. On many occasions, I provided this information to university information technology departments, including those in Manhattan, which were able to identify the compromised student accounts and take steps to prevent further use of those accounts' credentials. However, due to the number of universities victimized by Sci-Hub and those universities' differing levels of

³ See *supra*, paragraph 45.

expertise and responsiveness, Elsevier's efforts have been largely ineffective in preventing Sci-Hub's continued intrusions.

51. I am aware that Sci-Hub apparently obtained students' access credentials, at least in some circumstances, by offering payment for those credentials. According to statements posted to Sci-Hub's "donate" page at or around this time, several PayPal payments were sent for the purpose of "Buying a university proxy." A true and correct screenshot of Sci-Hub's "donate" page, retrieved on or about June 17, 2013, is attached hereto as Exhibit W.

52. By approximately March, 2014, through their identification and disabling of compromised student accounts, Elsevier and its subscriber universities had succeeded in vastly reducing Sci-Hub's use of university proxies to pirate ScienceDirect content. Sci-Hub, on its Twitter account, expressed its frustration with these efforts, stating "Due to the huge amount of accounts that were closed recently we were forced to introduce limits on the maximum number of users, especially foreigners." A true and correct screenshot of this Twitter post, dated March 22, 2013, along with a translation, is attached as Exhibit C to the Declaration of David M. Hirschberg.

53. In response to Elsevier's efforts to reduce Sci-Hub's piracy, Sci-Hub adapted its methods. Beginning in or about March, 2014, rather than connect to ScienceDirect through a university proxy, Sci-Hub instead began using university proxies only to obtain an authorization token, which it subsequently used to connect to ScienceDirect from a different source IP address. This method of obtaining unauthorized access to ScienceDirect is much more difficult to investigate and, to date, Elsevier has been unable to effectively combat Sci-Hub's new vector of attack.

E. Sci-Hub and the Library Genesis Project Work in Concert to Infringe the Copyrights of Elsevier and Other Scientific Publishers

54. As noted above in paragraph 43, Sci-Hub apparently stores user-requested scientific journal articles in the Library Genesis Project's repository and retrieves those articles from the Library Genesis Project if they are subsequently requested.

55. Based on the description of Sci-Hub's activities on its donations page, Sci-Hub relies on the Library Genesis Project's repository as a source of infringing content and intends to do so to a greater degree in the future.

56. As noted above in paragraph 26, the Library Genesis Project redirects requests for scientific journal articles it does not already possess in its repository to Sci-Hub's search and retrieval system. In this way, the Library Genesis Project relies on Sci-Hub as a means of obtaining new pirated scientific content.

57. Libgen.org's "Scientific Articles" web page contains a prominent and direct link to Sci-Hub in the menu bar at the top of the page.

F. Sci-Hub's Intrusion into University Computing Systems Poses a Significant Risk to Students, Universities, and the Public

58. In addition to the harm suffered by Elsevier and other publishers as the result of Sci-Hub's and the Library Genesis Project's infringing activities, the unauthorized intrusion into university computing systems through compromised student credentials has the potential to cause serious injury to the universities, students, and the public.

59. While many universities' ScienceDirect subscriptions are unlimited in nature (*i.e.*, the university pays a flat fee for access to ScienceDirect rather than pay on a per-article basis), some universities have a "draw down" account. In this scenario, the university pays for a fixed dollar amount or number of articles which may be accessed by its students and staff. When this

threshold is met, the university must pay additional sums in order to continue its access. When an unauthorized entity – such as Sci-Hub – uses such a university’s subscription, it depletes the funds on deposit and potentially deprives legitimate users of their university’s paid-for access and requires that the university purchase additional access.

60. Unauthorized access to university systems also poses a number of significant risks entirely separate from those relating to scientific databases. Criminals often use access to compromised systems to facilitate hacking activities, attacks on third-party systems, and the distribution of malware or botnets. In addition, university systems often contain sensitive and personal information concerning the students whose credentials have been compromised. Access to this type of information is often used by malicious actors to engage in identity theft or other wrongdoing.

G. Contact Email Addresses of Defendants

61. Elsevier is unaware of the true names or locations of the Doe Defendants. Elsevier has, however, in the course of its investigation discovered email addresses posted by Defendants on their websites at which Elsevier believes Defendants may be reached. These include:

- For Sci-Hub.org – support@sci-hub.org and sci.hub.org@gmail.com;
- For Alexandra Elbakyan – mindwrapper@gmail.com.

True and correct screenshots linking Defendants to support@sci-hub.org and mindwrapper@gmail.com are attached hereto as Exhibit X. Sci-Hub’s use of the sci.hub.org@gmail.com email address is demonstrated in Exhibit W.

62. For elibgen.org, libgen.info, and estrorecollege.org, each of which re-directs to freescienceengineering.org, Elsevier has located an email address for those sites at

info.freescienceengineering.org/index.html. Specifically, the “EMAIL” links on that page direct to the address libgeninfo@yandex.com. A true and correct screenshot of this page is attached hereto as Exhibit Y.

63. Each of the Defendants’ websites has been registered using a privacy protection service which anonymizes the true owner of the site by acting as a registration proxy. These services, in turn, provide a unique, anonymous email address for each site owner and submit that email address to the appropriate registrar for inclusion in WHOIS records. Email correspondence sent to these email addresses is typically forwarded to the sites’ true operators.

64. According to publicly-available WHOIS records, the operators of the Defendant websites can be reached through their privacy protection service-provided email addresses at:

- For Sci-Hub.org: 522ab14bo3mfc7dy@5225b4d0pi3627q9.privatewhois.net (See Exhibit Q.);
- For Libgen.org: 54a8a84ays7z9z21@5225b4d0pi3627q9.whoisprivacycorp.com (See Exhibit E.);
- For Elibgen.org: 54ca64605o1goil9@5225b4d0pi3627q9.whoisprivacycorp.com (See Exhibit M.);
- For Libgen.info: 54ada35fyv9gp5gt@5225b4d0pi3627q9.whoisprivacycorp.com (See Exhibit N.);
- For Estrorecollege.org: 54a19036ejtinug6@5225b4d0pi3627q9.whoisprivacycorp.com (See Exhibit O.); and
- For Bookfi.org: 52e4d617f98mrf0y@5225b4d0pi3627q9.privatewhois.net (See Exhibit P.)

I declare under penalty of perjury that the foregoing is true and correct.

Dated June 10, 2015.

By: 
Anthony Woltermann