

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)

**SUPPLEMENTAL DECLARATION OF PAUL F. DODA, ESQ. IN SUPPORT OF  
PLAINTIFFS' APPLICATION FOR AN ORDER TO SHOW CAUSE FOR A  
PRELIMINARY INJUNCTION**

I, PAUL F. DODA, declare as follows is true and correct:

1. I submit this Supplemental Declaration in support of Plaintiffs' reply brief in support of their application for entry of a preliminary injunction.
2. As Global Litigation Counsel at Elsevier Inc., I am familiar with Elsevier's efforts to ensure that content published by Elsevier and its affiliated corporate entities (collectively, "Elsevier") is made available to individuals and institutions in developing and low income areas.
3. In particular, I am aware that Elsevier provides market-based pricing in lesser-developed markets and offers numerous alternative pay models, including rental subscriptions and "pay-per-use" models. Examples are provided on our access pages:

<http://www.elsevier.com/books-and-journals/access>

4. Elsevier also provides specific low-cost -- or even free -- access options to its publications in developing countries. This includes programs such as Research4Life, the ICTP e-journals delivery service, the Library of Alexandria, TEEAL, and a wide array of open access publications. Each of these programs is described on our website:

<http://www.elsevier.com/books-and-journals/access#Developing>. In the next paragraph we provide more detailed information about Research4Life in particular as our flagship initiative for developing countries.

3. Research4Life is a public-private partnership between United Nations agencies, universities and publishers to reduce the knowledge gap between developing and industrialized countries.<sup>1</sup> As a founding partner, Elsevier contributes over a quarter of the nearly 50,000 peer reviewed resources in Research4Life, encompassing our ScienceDirect and Scopus database products, including over 3,100 Elsevier journals and 13,000 books. We also provide technical and communications expertise to advance Research4Life, and have committed to the program through 2020. In 2014, there were over 3.9 million authorized Research4Life article downloads from Elsevier's ScienceDirect platform -- the platform that the Defendants have illegally accessed as part of their piracy scheme.

4. Elsevier also participates in the International Centre Theoretical Physics (ICTP) eJournals Delivery Service,<sup>2</sup> which provides individual scientists in developing countries working in the fields of physics, mathematics and computer science with free access to scientific literature in their disciplines, including approximately 430 Elsevier journals.

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<sup>1</sup> See Research4Life website, available at <http://www.research4life.org>.

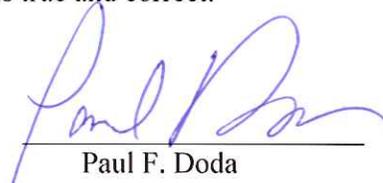
<sup>2</sup> See International Centre Theoretical Physics (ICTP) eJournals Delivery Service website, available at <http://ejds.ictp.it/ejds>.

5. In addition to Research4Life and the ICTP eJournals Delivery Service, Elsevier also provides low-cost or free access to its publications through interlibrary loan arrangements from key national libraries and by Elsevier's Gold Open Access (immediate free access) and Open Archive (free access after an initial period) programs.

6. In sum, Elsevier has a goal of achieving universal access to scientific, technical and medical research information. We are committed to ensuring that access to scientific literature is available to everyone, including those who cannot afford to pay traditional subscription rates. We have worked diligently for many years to support this commitment in practice. Elsevier can afford to provide this low-cost and free access because of the subscriptions that are paid for by institutions and organizations with larger financial resources.

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

Dated: August 19, 2015.



Paul F. Doda