

EXHIBIT

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4. When information is “Deleted” from a computer hard drive, it is initially marked as deleted, but the contents of the file are not immediately removed or overwritten.

5. Rather, the blocks which formerly contained File A are no longer reserved, and may be overwritten by subsequent writes to the drive.

6. In a drive with a spinning magnetic platter for storage, the drive typically attempts to optimize writes such that a file is written in a single contiguous series of blocks.

7. This increases the efficiency by which they can be read back and reduces seek times in accessing the files.

8. As a result, deleted files are often wholly or partly recoverable and detectable long after having been erased.

9. On Flash based storage devices, such as those found in iPads and high end computers, the drive optimizes to avoid wearing out a single cell of memory, which has a limited number of useable write cycles.

10. To facilitate this, an SSD drive controller will mark a deleted file in a similar fashion to a spinning drive, however it will not be until it’s written to most of the available cells that it will then begin to overwrite previously deleted information.

11. As cells reach their maximum life cycle, the drive will mark them as bad, effectively decaying the storage capacity over time.

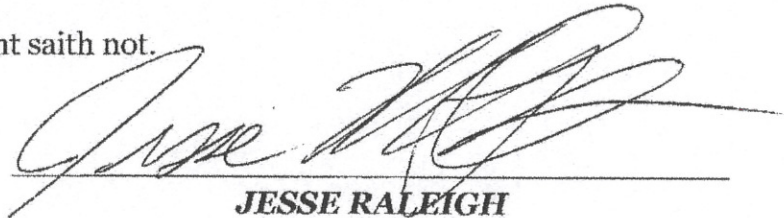
12. In order to effectively remove any traces of infringing files, software similar to that which was used to detect infringement must be employed.

13. Where the forensics software is designed to identify and catalog specific types of files, cleanup software is designed to identify and delete those types of files.

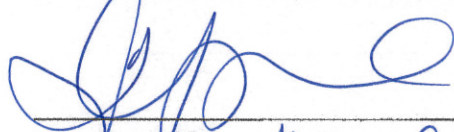
14. Also similarly, it would be indiscriminate in its approach to removing offensive files, such that there would be all or nothing remaining on the computer it had been employed on.

15. This would have removed all of the fingerprints and metadata accumulated from years of housekeeping neglect.

Further Affiant saith not.


JESSE RALEIGH

Subscribed and sworn to before me
this 12th day of February, 2016.


Notary Public, MACOMB COUNTY
ACTING IN OAKLAND COUNTY, MICHIGAN
My Commission Expires: 11/07/2017