FILED CLERK, U.S. DISTRICT COURT DAVID J. VAN HAVERMAAT (Cal. Bar No. 175761) 1 5/22/18 Email: vanhavermaatd@sec.gov DAVID S. BROWN (Cal. Bar No. 134569) 2 CENTRAL DISTRICT OF CALIFORNIA Email: brownday@sec.gov BY: CS 3 Attorneys for Plaintiff Securities and Exchange Commission 4 5/22/18 5 Joseph G. Sansone, Unit Chief (Market Abuse Unit) CENTRAL DISTRICT OF CALIFORNIA New York Regional Office BY: CS 200 Vesey Street, Suite 400 New York, New York 10281 6 7 Robert A. Cohen, Unit Chief (Cyber Unit) 8 Headquarters 100 F'Street, N.E. Washington, District of Columbia 20549 9 Michele Wein Layne, Regional Director Amy Jane Longo, Regional Trial Counsel 10 444 S. Flower Street, Suite 900 11 Los Angeles, California 90071 Telephone: (323) 965-3998 Facsimile: (213) 443-1904 12 13 UNITED STATES DISTRICT COURT 14 CENTRAL DISTRICT OF CALIFORNIA 15 WESTERN DIVISION 16 17 Case No. CV18-4315-DSF(JPRx) SECURITIES AND EXCHANGE COMMISSION. 18 **DECLARATION OF SADAGOPAN** Plaintiff, **GOPINATH** 19 20 VS. 21 TITANIUM BLOCKCHAIN INFRASTRUCTURE SERVICES. 22 INC.; EHI INTERNETWORK AND SYSTEMS MANAGEMENT, INC. 23 aka EHI-INSM, INC.; and MICHAEL 24 ALAN STOLLERY aka MICHAEL STOLLAIRE, 25 Defendants. 26 27

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DECLARATION OF SADAGOPAN GOPINATH

I, Sadagopan Gopinath, declare, pursuant to 28 U.S.C. § 1746, as follows:

- 1. I work as an Information Technology ("IT") Developer/Engineer for an IT company. I sometimes use "Gopi" as a shortened version of my first name. 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. In or about March 2018, I became aware that the SEC had requested information concerning companies called Titanium Blockchain Infrastructure Services, Inc. ("TBIS") and EHI Internetwork and Systems Management, Inc. ("EHI"), and an individual named Michael Stollaire aka Michael Stollery or Michael Stoller ("Stollaire").
- 4. The SEC provided me with two documents that contain what appears to be a testimonial or recommendation attributed to "Gopi Sadagopan, Senior Software Designer at Hewlett Packard" downloaded from the TBIS and EHI websites. The SEC asked me to review them. Attached hereto as Exhibit 1 are true and correct copies of the documents the SEC asked me to review. I used to work for Hewlett Packard as an IT Developer/Engineer. Although my name is Sadagopan (Gopi) Gopinath, I recognized the language in those documents because they resemble a recommendation I provided to Stollaire on LinkedIn around 2013. I became acquainted with Stollaire around 2013 when he worked as an independent contractor at Hewlett Packard on an internal IT project that I was working on. Stollaire worked on that project from his home. I never met him. The LinkedIn recommendation was provided by me in my personal capacity to Stollaire in his personal capacity and did not mention any company names.

- 5. I never gave Stollaire permission to use my name, or what appears to be my name, in any marketing materials or advertising for TBIS or EHI, or for any other purpose.
- 6. The SEC provided me with a screenshot from the TBIS website that contains the "Hewlett Packard" and "Hewlett Packard Enterprise" names and logos. The SEC asked me to review it. Attached hereto as Exhibit 2 is true and correct copy of the screenshot the SEC asked me to review. I never authorized Stollaire to the use "Hewlett Packard" or "Hewlett Packard Enterprise" names or logos in any marketing materials, or advertising for TBIS, or for any other purpose.

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

Executed this 5th day of April, 2018 at Roseville, California.

Sadagopan Gopinath

EXHIBIT 1

"This award is presented to you in recognition of your outstanding performance and invaluable contributions to the Capacity Management Tool (HP Service Health Reporter {SHR}) Ready for Use deployment. Your skills and efforts have contributed immeasurably to our success. Thank you for your dedication."

~ Laura Rasor, Project Manager, Boeing

"I worked with Mike Stollaire on a major project to upgrade BSM to version 9.21. Mike took the lead role in designing, developing, implementing, and testing the BSM System Health application meeting the business requirements. He was always calm and completed his tasks on time. He is very helpful and works as a team with other colleagues. I strongly recommend EHI for any lead positions."

~ Gopi Sadagopan, Senior Software Designer at Hewlett Packard

"Thank you for all of your hard work and dedication over this past year. We and the client have been very happy and fortunate to have you with us since day one. Even if we do not have the opportunity to talk or meet regularly, we remain aware of and sincerely appreciate your significant contributions to our and our client's success. Thank you for that."

~ Mark Cohen, President of Ntelicor, L.P.

"I worked with Mike Stollaire on a major project to upgrade BSM to version 9.21. Mike took the lead role in designing, developing, implementing, and testing the BSM System Health application meeting the business requirements. He was always calm and completed his tasks on time. He is very helpful and works as a team with other colleagues. I strongly recommend him for any lead positions."

Gopi Sadagopan

Senior Software Designer at Hewlett Packard

Don't just take our clients words for it, find out for yourself how EHI can help you today!

Schedule A Demo

Exhibit 1 Page 4

EXHIBIT 2



Exhibit 2 Page 5