

1 THOMAS F. ZUBER, (SBN 226260)
tzuber@zuberlawler.com
2 JEFFREY J. ZUBER, (SBN 220830)
jzuber@zuberlawler.com
3 TOMAS A. ORTIZ (SBN 188873)
tortiz@zuberlawler.com
4 J. RAZA LAWRENCE, (SBN 233771)
rlawrence@zuberlawler.com
5 **ZUBER LAWLER LLP**
350 S. Grand Avenue, 32nd Floor
6 Los Angeles, California 90071 USA
Telephone: +1 (213) 596-5620
7 Facsimile: +1 (213) 596-5621

8 Attorneys for Plaintiff
SPADA Innovations, Inc.

9
10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
12

13 SPADA INNOVATIONS, INC.,

14 Plaintiff,

15 v.

16 AT&T COMMUNICATIONS, LLC,
17 AT&T SERVICES, INC., AT&T
18 MOBILITY LLC and PACIFIC BELL
TELEPHONE COMPANY,

19 Defendant.

Case No. 2:24-cv-06703-MWF-MAR

**DECLARATION OF J. RAZA
LAWRENCE IN SUPPORT OF
PLAINTIFF'S REQUEST FOR
JUDICIAL NOTICE**

*Filed concurrently with Opposition;
Request for Judicial Notice*

Date: December 16, 2024
Time: 10:00 a.m.
Crtrm.: 5A

Trial Date: None Set

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24 I J. Raza Lawrence, declare as follows:

25 1. I am an attorney licensed to practice before this Court and am counsel
26 for Plaintiff SPADA Innovations, Inc. ("SPADA") in the above-captioned matter. I
27 submit this declaration in support of Plaintiff's Request for Judicial Notice in
28 connection with its Opposition to Defendants' Motion to Dismiss.

1 2. The facts set forth herein are based on my personal knowledge, and if
2 called as a witness, I could and would testify competently to these facts under oath.

3 3. Attached hereto are true and correct copies of the following documents,
4 which are publicly available and directly relevant to SPADA's claims.

5 4. Exhibit 1: Article dated June 10, 2022, titled "AT&T Hits Industry-First
6 20 Gigabits per Second Symmetrical Speed on Production Fiber Network," available
7 at <https://about.att.com/innovationblog/2022/20-gbps-symmetric-speeds.html>. This
8 document is published on AT&T's official corporate website and discusses its use of
9 PON technology.

10 5. Exhibit 2: Article dated January 16, 2018, titled "AT&T Completes
11 Open Source XGS-PON Field Trials," available at:
12 https://about.att.com/story/xgspon_field_trials.html This article discusses AT&T's
13 XGS-PON deployments and integration of standards-compliant technology.

14 6. Exhibit 3: Article dated April 24, 2023, titled "Looking Back on 10
15 Years of AT&T Fiber," available at: [https://about.att.com/blogs/2023/10-years-](https://about.att.com/blogs/2023/10-years-fiber.html)
16 [fiber.html](https://about.att.com/blogs/2023/10-years-fiber.html) This article discusses AT&T's long-term investments in fiber
17 infrastructure

18 7. Exhibit 4: White Paper published and copyrighted by AT&T in 2018,
19 titled "The Defense Network of Tomorrow—Today," available at:
20 [https://www.business.att.com/content/dam/attbusiness/reports/industries-public-](https://www.business.att.com/content/dam/attbusiness/reports/industries-public-sector-federal-dod-network-of-future-white-paper.pdf)
21 [sector-federal-dod-network-of-future-white-paper.pdf](https://www.business.att.com/content/dam/attbusiness/reports/industries-public-sector-federal-dod-network-of-future-white-paper.pdf) This document discusses
22 RFC 4364 compliance in AT&T's MPLS VPN services.

23 8. Exhibit 5: Document titled "AT&T VPN Service Customer Router
24 Configuration Guide" (2015), hosted at:
25 <https://www.scribd.com/document/320441231/Router-Guide> This guide provides
26 detailed instructions for VPN configuration, citing RFC 4364.

27 9. Exhibit 6: Document titled "Seven Pillars of Carrier Grade Security in
28 the AT&T Global IP/MPLS Network" (2011), hosted at:

1 [https://www.scribd.com/document/324020059/MPLS-Seven-Pillars-of-](https://www.scribd.com/document/324020059/MPLS-Seven-Pillars-of-CarrierGrade-Security)
2 [CarrierGrade-Security](https://www.scribd.com/document/324020059/MPLS-Seven-Pillars-of-CarrierGrade-Security) This document discusses AT&T's reliance on VRF and RFC
3 4364 for secure network operations.

4 10. Exhibit 7: Network Working Group Request for Comments: 4364,
5 dated February 2006, titled "BGP/MPLS IP Virtual Private Networks (VPNs)," available at: <https://datatracker.ietf.org/doc/html/rfc4364> This document defines
6 the technical standards underlying AT&T's use of VRF.
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8 11. Exhibits 8 and 9: Contracts between the State of Tennessee and AT&T
9 for telecommunications services, available at:

10 [https://capitol.tn.gov/Archives/Joint/committees/fiscal-](https://capitol.tn.gov/Archives/Joint/committees/fiscal-review/archives/106ga/contracts/RFS%20317.01-03036%20F&A%20-%20OIR%20(AT&T%20Corporation%20-%20amendment%203).pdf)
11 [review/archives/106ga/contracts/RFS%20317.01-03036%20F&A%20-](https://capitol.tn.gov/Archives/Joint/committees/fiscal-review/archives/106ga/contracts/RFS%20317.01-03036%20F&A%20-%20OIR%20(AT&T%20Corporation%20-%20amendment%203).pdf)
12 [%20OIR%20\(AT&T%20Corporation%20-%20amendment%203\).pdf](https://capitol.tn.gov/Archives/Joint/committees/fiscal-review/archives/106ga/contracts/RFS%20317.01-03036%20F&A%20-%20OIR%20(AT&T%20Corporation%20-%20amendment%203).pdf) and
13 [https://www.capitol.tn.gov/Archives/Joint/committees/fiscal-](https://www.capitol.tn.gov/Archives/Joint/committees/fiscal-review/contracts/RFS%20317.01-03165%20Telecommunication%20and%20Network%20Services.pdf)
14 [review/contracts/RFS%20317.01-](https://www.capitol.tn.gov/Archives/Joint/committees/fiscal-review/contracts/RFS%20317.01-03165%20Telecommunication%20and%20Network%20Services.pdf)
15 [03165%20Telecommunication%20and%20Network%20Services.pdf](https://www.capitol.tn.gov/Archives/Joint/committees/fiscal-review/contracts/RFS%20317.01-03165%20Telecommunication%20and%20Network%20Services.pdf). These
16 documents discuss RFC 4364 and VRF technologies.

17 12. Exhibit 10: RFC 4381, titled "Analysis of the Security of BGP/MPLS
18 IP Virtual Private Networks (VPNs)," available at:
19 <https://datatracker.ietf.org/doc/html/rfc4381>. This document outlines VRF's use in
20 secure data transmission.

21 13. Relevance and Public Availability: The above-listed documents are
22 publicly available from authoritative sources, including AT&T's official website,
23 reputable repositories like Scribd, and the Internet Engineering Task Force (IETF).
24 They are not subject to reasonable dispute, as their accuracy and authenticity can be
25 readily verified by the Court. These documents are directly relevant to SPADA's
26 allegations that AT&T's network implements SPADA's patented methods.

27 14. Based on the foregoing, Spada respectfully requests that the Court take
28 judicial notice of these documents pursuant to Federal Rule of Evidence 201.

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

3 Executed on November 25, 2024, at Los Angeles, California.

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5 /s/ J. Raza Lawrence
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