



6. MNIT explained several times that all this information had been destroyed because there was not a litigation hold for any of the information.

7. Relators also learned that MPCA stored data on a storage area network (“SAN”) managed by a different technical team.

8. On November 26, 2019, I sent an email asking XACT to inquire with the SAN technical team and answer certain questions regarding SAN’s data storage.

9. On December 2, 2019, XACT responded to the email, informing Relators that the SAN maintained data for 28 days and 2 full cycles.

I declare under penalty of perjury that everything that I have stated in this document is true and correct.

Dated: 12/27/2019

/s/ Vanessa L. Ray-Hodge  
VANESSA L. RAY-HODGE