

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)

DECLARATION OF ROBERT LENDENSKY

I, Robert Lendensky, declare as follows is true and correct:

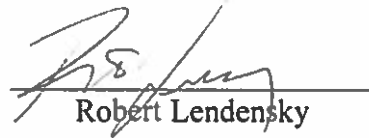
1. I am a Director of Business Development with TransPerfect. My office address is 3 Park Avenue, 39th Floor, New York, NY 10016.
2. I have reviewed the Supplemental Declaration of Anthony Woltermann in the above-titled action (the “Woltermann Declaration”) and Exhibits A and B thereto.
3. I hereby affirm that TransPerfect Legal Solutions employees captured each of the Russian-language website screenshots and VK postings on or about July 15, 2015, and that Exhibits A and B to the Woltermann Declaration contain true and correct copies of the VK postings as they appeared on the day they were captured. The documents were captured in a

forensically defensible manner by members of our team with extensive experience in the space of forensic data acquisition.

4. I hereby affirm that linguists contracted by TransPerfect Legal Solutions, who are subject matter experts with multiple years of linguistic experience, translated the text of the VK postings referenced above and that, to the best of my knowledge and belief, the translations provided in Exhibits A and B to the Woltermann Declaration are true and correct translations from Russian to English of those postings.

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

Dated August 18, 2015.


Robert Lendensky