

DECLARATION OF JOHAN JONGSMA

1. My name is Johan Jongsma. I am over 18 years of age, of sound mind, and capable of making this Declaration. The facts stated in this Declaration are within my personal knowledge and are true and correct. I am competent to testify concerning all facts contained herein.

2. I am currently an employee of SolarWinds Worldwide, LLC ("SolarWinds"), where I work as a Vice President of Product Strategy.

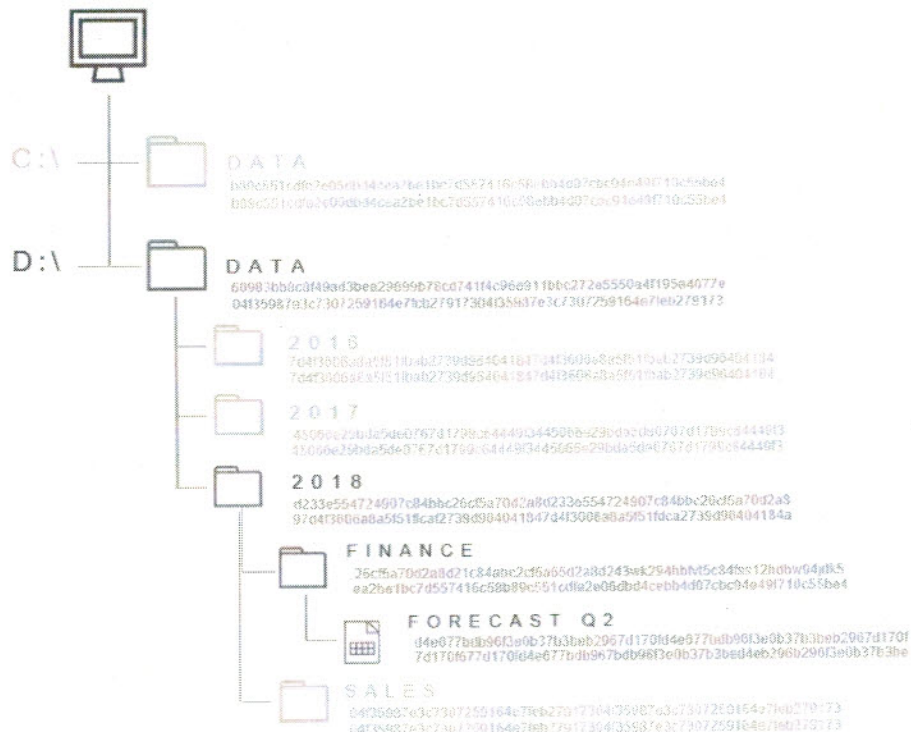
3. From 2005 to 2013, I was the Chief Technical Officer and co-founder of IASO Backup Technology BV. During that time, I was the main architect for all proprietary technologies in the IASO Backup product, a cloud-based backup service for virtual and physical servers, including technologies marketed as "True Delta Backup." IASO Backup—the product and the company—was acquired by LogicNow in 2013, which in turn was acquired by SolarWinds in 2016.

4. I am familiar with SolarWinds® Backup. Although SolarWinds® Backup is a relatively new product offering by SolarWinds, it is substantively the same as the IASO Backup product that I developed from 2005 to 2013, which had been offered and sold by IASO Backup and then LogicNow from 2013 to 2016. For the purposes discussed below, these products are identical. Accordingly, my reference to Backup below refers equally to both SolarWinds® Backup and IASO Backup.

5. Backup is a unified, cloud-based backup service for virtual and physical servers. Backup utilizes unique technologies that allow for shorter backup windows, faster restores, and sending and storing less data. Specifically, we designed Backup around one core idea: to skip all unnecessary work. For example, to only process changed files, and to only send and register unique data blocks.

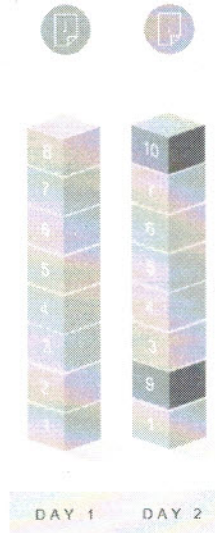
CONFIDENTIAL INFORMATION - OUTSIDE ATTORNEY'S EYES ONLY
PROVIDED AS PART OF SETTLEMENT DISCUSSION & SUBJECT TO F.R.E. 408

6. Backup treats every backup source as a nested structure of items. For example, Backup scans file structures to be backed up and generates a hash on every file and folder-level. It then compares hashes with the previous backup journal. For every folder with equal hashes, the folder is skipped and not processed. Backup only reads in the tree where necessary, and it only processes and backups files or folders that correspond to a different hash. An illustration is provided below:



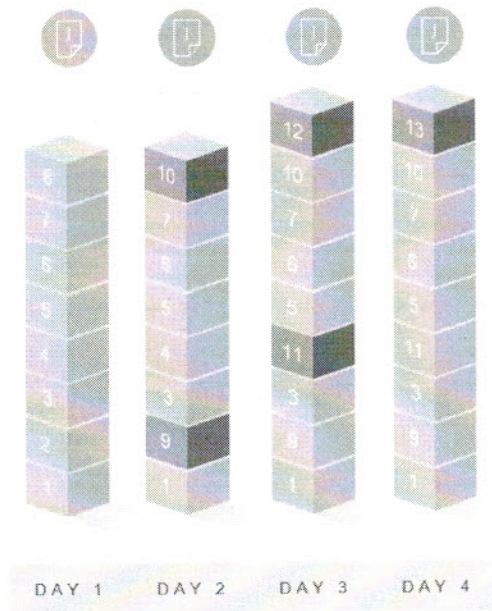
For folders with equal hashes (i.e., those that have been grayed out above), the files are not read, the data is not processed, and nothing else (i.e., no files, pointers, or other references) is sent to the cloud.

7. The illustration below illustrates a change in certain data blocks.



On Day 1, the files are backed up and a journal is written with hash codes per data block. On Day 2 we have a new version of the file: blocks 2 and 8 are changed (as reflected by new hash codes), so new blocks 9 and 10 are sent to and stored in the cloud. A new entry in the journal indicates that blocks 9 and 10 replace blocks 2 and 8, respectively. Nothing else is sent to the cloud. Thus, no information is sent regarding blocks 1 and 3 through 7, because nothing in those blocks changed.

8. On Day 3, block 4 changed (to Block 11) and the file was larger (Block 12). A new entry in the journal reflects that change and addition. Nothing else is sent to the cloud. On Day 4, block 12 is changed (to Block 13). A new entry in the journal reflects that change. Nothing else is sent to the cloud.



A restore to Day 2 is possible by removing Block 13 and changing Block 11 back to Block 4, which is reflected in the journal entries.

9. We refer to this deduplication aspect of Backup as "True Delta Backup."

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

Executed in Saint Petersburg, FL, on March 9th, 2019.

Mr. Johan Jongsma, Declarant