

In the
Supreme Court of the United States

DHL SUPPLY CHAIN (NETHERLANDS) B.V.,
Petitioner,

—v—

DEX SYSTEMS, INC.,

Respondent.

On Petition for Writ of Certiorari to the
United States Court for the Ninth Circuit Court of Appeals

Supplemental Appendix of Respondent

CLAUDE S. YOUNG
COUNSEL FOR RESPONDENT
GENERAL COUNSEL
DEX SYSTEMS
3600 VIA PESCADOR
CAMARILLO, CA 93012
(805) 388-1711
SYOUNG@DEX.COM

**Exhibits to First Declaration of Rajiv Duggal
(September 11, 2015)**

District Court Docket # 27

Deutsche Post DHL

xVPN Request

xVPN Request

Business Unit and Other Information

Business Unit	DSC
Business Region	Mainland Europe
Country	Netherlands
Sales Order (Work Package) Number	15012825
Project Name	NA

Customer Information

Customer Reference (e.g., Customer, Partner or External)	DEX
Company Name	DEX (Data Exchange Corp.)
Address	3600 Via Pescador
City	Camarillo
State	CA
Postal Code/ZIP	93012
Country	United States
Phone	

Customer Information - Primary Business Contact

Name	Rajiv Duggal
Function	
Phone	805-312-3499
Email	rduggal@lexsystems.com

DHL Link Requester

Name	Gerard Van Seumeren
Phone	+31 20 6555645
Email	Gerard.vanSeumeren@dhl.com
Service Desk Group	

DHL Link Request Owner

Name	Mark Kruyzen
Job Title	Service Level Manager
Department	IT Benelux
Phone	+31 6 52013749
Email	mark.kruyzen@dhl.com
Business Division	V7, Supply Chain
Service Desk Group	

ELR Requirements

Please specify ELR expiration date	12.02.2015
Average traffic throughput	
Unit	
Max. traffic throughput	
Unit	
Maximum number of Concurrent Connections (optional)	

Business Case

Business Case	DHL and DEX work in partnership to provide a complete end to end solution for reverse logistics business of Plantronics, a new customer in Beringe. Warehouse system is provided by DEX
---------------	---

Attached Supporting Documents

Document Name	File Name
Not specified	

Data Classification

A

Data types		Data Classification	Data Regulations			
Data type	Web Access to application and Print output from application	For Internal Use	None			
Additional Information						
Additional Information						
Admin Additional Information						
Admin Important Information						
Admin Additional Info						
Document Name	File Name					
Not specified						
Request Name	DEXPHX005					
Request Id	130212-XVP-7532					
Workflow Status	Pending Security Approval					
Task Progress	Assigned					
Request Type	4					
Creation Date	2013-02-12T14:55:05					
Archive	No					
Priority	Normal					
New/Update	False					
Submission						
By submitting this ELR, I confirm that I have read and agreed with the above	Y					
I confirm that the Service Owners of services in scope of this ELR provided their approval for implementation	Y					
Approvals						
List of Approvals:						
Approval Type	Approved	Emails	Approved By	Role	Date	Note
Technical Approval	Y	AMIS_TS_Security@dhl.com	dwimber	ELM Member	26/08/2013 19:38:58	
Security Approval	N	l Todd.luther@t-systems.com bryon.reynolds@t-systems.com		Security Approver		
Financial Approval	Y			Financial Approver		Not required yet
Implementation	N	AMIS_TS_Security@dhl.com		ELM Member		
PIR for Requester	N			Requester		
PIR for SA	N	elm.netmaster@dhl.com		SA		
Readers & Notifications						
List of people who can access this request						
Name	Email	Role				
Pieter Oudenhoven	pieter.oudenhoven@dhl.com	Senior Network Specialist				
List of service owners who can receive notifications						
Name	Email	Role				
Not specified						
DHL Link Secondary Contact						
Name	Eugene Bijsterveld					
Job Title	Application Analyst					
Department	IT Benelux					
Phone	+31 6 53332693					
Email	Eugene.Bijsterveld@dhl.com					
Business Division	V7, Supply Chain					
Service Desk Group						

Non-Disclosure Agreement

Attach Non-Disclosure Agreement (NDA)					
Document Name	File Name				
NDA DEX -DHL	NDA DEX for VPN.pdf				
This Version Description					
Communication Matrix/Network Diagrams					
Communication Matrix/Network Diagrams					
Document Name	File Name				
Not specified					
Primary Gateways					
Primary Gateway					
Gateway	External IP Address (Routable, No NAT)	Make and Model			
Primary DHL Gateway	199.41.253.14	Juniper			
Primary Remote Gateway	72.67.208.180	Cisco 2911			
Encryption Domain					
Remote IP Address/Network	DHL IP Address/Network				
7.250.77.160/29	199.41.0.0/22				
Secondary Gateways					
Is redundant VPN needed?	No				
Secondary Gateway					
Gateway	External IP Address (Routable, No NAT)	Make and Model			
Secondary DHL Gateway					
Secondary Remote Gateway	72.67.208.180	Cisco 2911			
Encryption Domain					
Remote IP Address/Network	DHL IP Address/Network				
10.1.0.0/16					
IKE					
IKE Phase I - II					
IKE Phase	Encryption Algorithm	Hash Algorithm	PFS Diffie Hellman Group	Lifetime	
Phase 1	AES 256 - Recommended by DHL	SHA-1 - Recommended by DHL	2 - Recommended by DHL	Other - 28800	
Phase 2	AES 256 - Recommended by DHL	SHA-1 - Recommended by DHL	2 - Recommended by DHL	3600s - Recommended by DHL	
NAT Rules					
NAT Rules					
Customer IP	Customer Translated IP				
Not specified					
Segmentation Firewall					
Are the DHL servers behind a firewall on the internal network?	No				
Firewall Hostname					
Access Control					
Access Control					
Source - Destination					
Id	Source IP Address / Host Name	Source Translated IP	Destination IP Address / Host Name	Destination Translated IP	Protocol
2	1. 7.250.77.160/29 -		1. 2.31.40.73 - 2. 2.31.40.79 - 3. 2.31.40.61 - 4. 2.31.40.67 - 5. 198.141.83.91 - 6. 198.141.83.92 - 7. 198.141.83.93 - 8. 198.141.83.94 - 9. 198.141.83.95 - 10. 198.141.83.96 - 11. 198.141.83.97 - 12. 198.141.83.98 -	1. 199.41.3.140 2. 199.41.3.141 3. 199.41.3.142 4. 199.41.3.143 5. 199.41.3.144 6. 199.41.3.145 7. 199.41.3.146 8. 199.41.3.147 9. 199.41.3.148 10. 199.41.3.149 11. 199.41.3.150	1. JetDirect,TCP,9100 2. LPD,TCP,515 3. IPP,TCP,631

Id	Source IP Address / Host Name	Source Translated IP	Destination IP Address / Host Name	Destination Translated IP	Protocol
			13. 10.162.18.55 -	199.41.3.160	
			14. 10.162.18.56 -	12.	
			15. 10.162.18.57 -	199.41.3.151	
			16. 10.162.18.58 -	13.	
			17. 10.162.18.53 -	199.41.3.152	
			18. 10.162.18.67 -	14.	
			19. 10.162.18.68 -	199.41.3.153	
			20. 10.162.18.69 -	15.	
			21. 198.141.83.77 -	199.41.3.164	
			22. 198.141.83.85 -	16.	
			23. 198.141.83.86 -	199.41.3.155	
			24. 10.162.18.71 -	17.	
				199.41.3.166	
				18.	
				199.41.3.157	
				19.	
				199.41.3.158	
				20.	
				199.41.3.159	
				21.	
				199.41.3.160	
				22.	
				199.41.3.161	
				23.	
				199.41.3.162	
				24.	
				199.41.3.163	

CMDB

Id	CMDB Service Name	CMDB Service Owner
2		

Notes

Id	Notes
2	

Related requests

Related Requests

Id	Name
	Not specified

0, #pkts decompressed: 0
ied: 0, #pkts compr. failed: 0
essed: 0, #pkts decompress failed: 0
ecv errors 55

: 72.67.208.180, remote crypto endpt.: 199.41.253.14
mtu 1500, ip mtu idb GigabitEthernet0/0
spi: 0xA24D57BD(2722977725)
oup: group2

{183835660)
56-aes esp-sha-hmac ,
Tunnel, }
iw_id: Onboard VPN:1043, sibling_flags 80000046, crypto map: dexmap
ring key lifetime (k/sec): (4467211/1063)

support: Y replay window size: 128

2722977725)
56-aes esp-sha-hmac ,
Tunnel, }
iw_id: Onboard VPN:1044, sibling_flags 80000046, crypto map: dexmap
ring key lifetime (k/sec): (4467189/1063)

support: Y replay window size: 128

From: Rajiv Duggal
Sent: Monday, May 18, 2015 10:30 AM
To: Chip Dickinson
Subject: VPN router interface stats for DHL VPN interface

```
DEX-HQ-2911-VPN#show int GigabitEthernet0/2
GigabitEthernet0/2 is up, line protocol is up
  Hardware is CN Gigabit Ethernet, address is fc99.474b.c9ea (bia fc99.474b.c9ea)
```

Description: **To External Custom (DHL VPN CIRCUIT)*****
Internet address is 7.250.77.161/16
MTU 1500 bytes, BW 1000000 Kbit/sec, DLY 1.0 usec,
reliability 255/255, txload 1/255, rxload 1/255
Encapsulation ARPA, loopback not set
Keepalive set (10 sec)
Full Duplex, 1Gbps, media type is RJ45
output flow-control is XON, input flow-control is XON
ARP type: ARPA, ARP Timeout 04:00:00
Last input 00:07:29, output 00:00:00, output hang never
Last clearing of "show interface" counters never
Input queue: 0/75/0/0 (size/max/drops/flushes); Total output drops: 0
Queueing strategy: fifo
Output queue: 0/40 (size/max)
5 minute input rate 0 bits/sec, 0 packets/sec
5 minute output rate 0 bits/sec, 0 packets/sec
 543104 packets input, 53026516 bytes, 0 no buffer
 Received 5132 broadcasts (0 IP multicasts)
 0 runts, 0 giants, 0 throttles
 0 input errors, 0 CRC, 0 frame, 0 overrun, 0 ignored
 0 watchdog, 0 multicast, 0 pause input
 717769 packets output, 56094607 bytes, 0 underruns
 0 output errors, 0 collisions, 0 interface resets
 0 unknown protocol drops
 0 babbles, 0 late collision, 0 deferred
 0 lost carrier, 0 no carrier, 0 pause output
 0 output buffer failures, 0 output buffers swapped out

Below are the stats for the VPN tunnel.

Interface: GigabitEthernet0/0
 Crypto map tag: dexmap, local addr 72.67.208.180
 protected vrf: (none)
 local ident (addr/mask/prot/port): (7.250.77.160/255.255.255.248/0/0)
 remote ident (addr/mask/prot/port): (199.41.0.0/255.255.252.0/0/0)
 current_peer 199.41.253.14 port 500
 PERMIT, flags={origin_is_acl}
 #pkts encaps: 537933, #pkts encrypt: 537933, #pkts digest: 537933
 #pkts decaps: 340176, #pkts decrypt: 340176, #pkts verify: 340176

Stuart Young

From: Laura Marian (DHL NU) <laura.Marian@dhl.com>
Sent: Sunday, December 23, 2012 1:30 AM
To: Rajiv Duggal
Cc: Padraig Keaveney
Subject: System uptime report

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Rajiv,

I have not seen the system uptime report for a while. Please start again with sending it.

I would also like to discuss the content of system uptime report.

Our feeling is that purpose of the file is not clear.
PLT is interested in system performance. So they need to know when system is entirely down, or printers are not working, or we have a database issue that affects a process, or a customer is affected etc.
They do not need to know that we ask for work instructions for giving ship dock rights for example. This is an operational question. System is working just fine, we just need how to perform a certain transaction.

I do not find it a bad idea to record all our questions.
However my proposal is to record the operational questions on a separate worksheet. We do not need to measure performance on those. If we feel response is too slow (which Padraig knows is the case when he depends on US), we will escalate separately.
We will need performance measured for actual system issues: not able to access system at all, printers down, webservices issues, B2B down, pick undo errors that delays shipping etc.
I think this should simplify the reporting.

If we look for example at "DHL Plantronics Daily Incident Report 12-10-2012.xlsx".
* Label Printing extremely Slow -> correct, system performance issue
* Order 74997 in RESV status -> correct, system performance issue as 1 customer was impacted
* Error @ inbound 'K_DEX_SALES_ORDER' -> correct, system performance issue, as this is a recurrent problem that slows down our operations
* Adding Person in HR List -> not system performance issue, system was working, we just had an operational question
I hope examples above make this request clearer.

Let me know your thoughts on this. I think it is beneficial for both parties if we make these changes.

Merry Christmas and a happy New Year!
Thank you and regards,
Laura

8

Stuart Young

From: Gerard Van Seumeren (DHL NL) <Gerard.vanSeumeren@dhl.com>
Sent: Wednesday, March 05, 2014 9:05 AM
To: Rajiv Duggal; Dimitri Vancaelenberg; Padraig Keaveney; Roberto Abraham
Cc: Jan Willem Helmig (DHL BE); J.M.C. Jorma Aarts (DHL NL)
Subject: RE: DEX/GTN NBD order printing => change printer

Hi Rajiv,

Its clear, thanks. I will call Dimitri to see how we can fix this.

Kind regards,

Gerard van Seumeren

CO

Page 37 of 48 Page ID #:290

Document 27 Filed 09/12/15

From: Rajiv Duggal [mailto:r.duggal@dexsystems.com]
Sent: woensdag 5 maart 2014 18:02
To: Dimitri VAN CAELENBERG (DHL BE); Padraig Keaveney; Roberto Abraham; Gerard Van Seumeren (DHL NL)
Cc: Jan Willem Helmig (DHL BE); J.M.C. Jorma Aarts (DHL NL)
Subject: RE: DEX/GTN NBD order printing => change printer

Please note when I say printing is on active failover I mean print jobs route over both tunnels in a round robin fashion. If one tunnel is nonresponsive then printing will direct all load to the other tunnel.
From DHL standpoint these are 2 independent VPN networks.

Best Regards,

Rajiv Duggal
Director, IT Operations
DEX Systems – After Sales Supply Chain Software
Office: 805-388-1711 x528 | Mobile: 805-312-3499
Email: r.duggal@dexsystems.com | www.dexsystems.com



Page ID #291

From: Rajiv Duggal
Sent: Wednesday, March 05, 2014 8:53 AM
To: Dimitri Vancaelenbergh; Padraig Keaveney; Roberto Abraham; Gerard Van Seumeren (DHL NL)
Cc: Jan Willem Helmig (DHL BE); J.M.C. Jorma Aarts (DHL NL)
Subject: RE: DEX/GTN NBD order printing => change printer

Hi Dimitri,

For printing both VPNs are on an active failover. Passive failover is for the entire ERP suite

We can technically initiate the printer setup on one link, however we will not have failover available for this printer.

We would appreciate your teams commitment to help setup the NAT on the DEX US link. This would ensure we are compliant with the design we have prescribed

Let me know how you want to proceed.

Best Regards,

Rajiv Duggal
Director, IT Operations
DEX Systems – After Sales Supply Chain Software
Office: 805-388-1711 x528 | Mobile: 805-312-3499
Email: rduggal@dexsystems.com | www.dexsystems.com

DEX|SYSTEMS

2:15-cv-03841-JAK

From: Dimitri VAN CAELENBERG (DHL BE) [mailto:Dimitri.VANCAELENBERG@dhl.com]
Sent: Wednesday, March 05, 2014 8:34 AM
To: Rajiv Duggal; Padraig Keaveney; Roberto Abraham; Gerard Van Seumeren (DHL NL)

Cc: Jan Willem Helmig (DHL BE); J.M.C. Jorma Aarts (DHL NL)
Subject: RE: DEX/GTN NBD order printing => change printer

Hi Rajiv, Padraig, cc Gerard Van Seumeren,

Can you please investigate/comment on the below question from Gerard and provide us with some guidelines?

There are 2 VPN links to DEX. One points to an Amazon data center in Ireland and one in the US (backup). There is no automatic failover but DEX is managing this on the application level. Meaning that static mappings need to be applied twice. As far as I know the Amazon EIR is the primary one and US is backup.

It's our goal to change the automated printing of ND orders to a different printer, but this seems to be a very difficult thing to do as we're busy with this as from 23/01. What can be done to speed this up? Conf call. ?

Thank you

Kind Regards,

Dimitri Van Caelebenberg
Logistics Support & Project Manager

Office: +32 (0) 2 719 69 50
Mobile: +32 (0) 475 74 39 64
Dimitri.VanCaelebenberg@dhl.com

DHL Supply Chain, Services Parts Logistics
Diegem Hoek Woluwelaan 145
1831 Diegem Belgium

Conference Call details:

Numbers: <http://www.btcconferencing.com/dhl/fifth.asp>
Participant code: 70216644
Link for Webex: <https://teamconnectconferencing.com/join>

From: Rajiv Duggal [mailto:rduggal@dexsystems.com]
Sent: Thursday 13 February 2014 10:17
To: Dimitri VAN CAELENBERG (DHL BE); Padraig Keaveney; Roberto Abraham; Gerard Van Seumeren (DHL NL)

Cc: Jan Willem Helmig (DHL BE); J.M.C. Jorma Aarts (DHL NL)
Subject: RE: DEX/GTN NBD order printing => change printer

Hi Dimitri,
Dimitri,

Geord was instrumental in co-coordinating with the DHL US network team. Copying him on the email for guidance in this matter.
We need to update the NAT ip on the DHL US VPN circuit.

48
40

Best Regards,

Rajiv Duggal
Director, IT Operations
DEX Systems – After Sales Supply Chain Software
Office: 805-388-1711 x528 | Mobile: 805-312-3499
Email: rduggal@dexsystems.com | www.dexsystems.com

Filed On 02/11/2014
Dex Systems

Client 27

From: Dimitri VAN CAELENBERG (DHL BE) [mailto:Dimitri.VANCAELENBERG@dhl.com]
Sent: Thursday, February 13, 2014 10:10 AM
To: Rajiv Duggal; Padraic Keaveney; Roberto Abraham
Cc: Jan Willem Helmig (DHL BE); J.M.C. Jorma Aarts (DHL NL)
Subject: RE: DEX/GTN NBD order printing => change printer

Hi Rajiv, Padraic,

Can you please advise how this was requested the previous time (for the 11 PCs?) ?

I've requested the required information to our IT team, but seems to be a slow process

Kind Regards,

11/02/2014
Dimitri Van Caeleberg
Logistics Support & Project Manager
Caterpillar
Office: +32 (0) 2 719 69 50

Mobile: +32 (0) 475 74 39 64
Dimitri.vancaelenberg@dhl.com

DHL Supply Chain, Services Parts Logistics
Diegem Hoek Wouwelaan 145
1831 Diegem Belgium

Conference Call details:

Numbers: <http://www.bconferencing.com/dhl/tfn.asp>

Participant code: 70216644

Link for Webex: <https://teamconnectconferencing.com/join>

From: Rajiv Duggal [mailto:rduggal@dexsystems.com]
Sent: Thursday 13 February 2014 6:58
To: Dimitri VAN CAELENBERG (DHL BE); Padraig Keaveney; Roberto Abraham
Cc: Jan Willem Helmig (DHL BE); J.M.C. Jorma Aarts (DHL NL)
Subject: RE: DEX/GTN NBD order printing => change printer

Hi Dimitri,

Yes we need a NAT for the printer address for the US circuit as well.

Thanks
Rajiv

From: Dimitri VAN CAELENBERG (DHL BE) [mailto:Dimitri.VANCAELENBERG@dhl.com]
Sent: Thursday, February 13, 2014 9:53 AM
To: Rajiv Duggal; Padraig Keaveney; Roberto Abraham
Cc: Jan Willem Helmig (DHL BE); J.M.C. Jorma Aarts (DHL NL)
Subject: RE: DEX/GTN NBD order printing => change printer

Hi Rajiv,

Can you please advise?

Kind Regards,

Dimitri Van Caelenberg
Logistics Support & Project Manager

Office: +32 (0) 2 719 69 50
Mobile: +32 (0) 475 74 39 64

Document 27 Page 41 of 48 Page ID #:294

Case 2:15-cv-03841-JAK-RAO Filed 09/12/15

Dimitri.vancaelenberg@dhl.com

#295
DHL Supply Chain, Services Parts Logistics
Diegem Hoek Woluwelaan 145
ID 1831 Diegem
Belgium

eConference Call details:

Page Numbers: <http://www.btcconferencing.com/dhl/itn.asp>
Participant code: 70216644

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Link for Webex: <https://teamconnectconferencing.com/join>

42 From: Dimitri VAN CAELENBERG (DHL BE)

42 Sent: Friday 7 February 2014 3:24

42 To: 'Rajiv Duggal'; Padraig Keaveney; Roberto Abraham

42 Cc: Jan Willem Helmig (DHL BE); J.M.C. Jorma Aarts (DHL NL)

42 Subject: RE: DEX/GTN NBD order printing => change printer

09/12/15
Hi Rajiv,

09/12/15 Filed Sorry for asking.

09/12/15 Document 27 Do i need to request:

09/12/15 Additionally require a nat. IP on the network 199.41.3.140-163 (DHLUS Network, 199.41.3.151 and 199.41.3.152 will likely be available for use).

09/12/15
Or are you OK with the info below.

09/12/15 Kind Regards,

09/12/15 Dimitri Van Caelenberg
Logistics Support & Project Manager

09/12/15 Office: +32 (0) 2 719 69 50
Mobile: +32 (0) 475 74 39 64
Dimitri.vancaelenberg@dhl.com

09/12/15 15 DHL Supply Chain, Services Parts Logistics
2 Diegem Hoek Woluwelaan 145
Case 1831 Diegem
Belgium

09/12/15 Conference Call details:

Numbers: <http://www.bitconferencing.com/dhl/itfn.asp>
Participant code: 70216644

Link for Webex: <https://teamconnectconferencing.com/join>

ID #:296
From: Rajiv Duggal [mailto:rduggal@dexsystems.com]
Sent: Thursday 6 February 2014 5:39
To: Dimitri VAN CAELENBERG (DHL BE); Padraic Keaveney; Roberto Abraham
Cc: Jan Willem Helmig (DHL BE); J.M.C. Jorma Aarts (DHL NL); Rajiv Duggal

Subject: RE: DEX/GTN NBD order printing => change printer
Page 43 of 48

Hi Dimitri,

Page 43 of 48
Appreciate the information below.
This provides a NAT for the Europe circuit. Additionally require a nat IP on the network 199.41.3.140-163 (DHLUS Network, 199.41.3.151 and 199.41.3.152 will likely be available for use).

Best Regards,

Rajiv Duggal
Director, IT Operations
27 DEX Systems – After Sales Supply Chain Software
Office: 805-388-1711 x528 | Mobile: 805-312-3499
Email: rduggal@dexsystems.com | www.dexsystems.com



Thanks
Rajiv

From: Dimitri VAN CAELENBERG (DHL BE) [mailto:Dimitri.VANCAELENBERG@dhl.com]
Sent: Thursday, February 06, 2014 7:04 AM

To: Padraic Keaveney; Roberto Abraham
Cc: Jan Willem Helmig (DHL BE); J.M.C. Jorma Aarts (DHL NL); Rajiv Duggal
Subject: RE: DEX/GTN NBD order printing => change printer
Case 2:15-cv-03841-JAK-RAO Document 48 Filed 09/12/15 Page 43 of 48

Hi Padraic,

Blog Add-ons IP Search

MyIpTest.com

Submit Query

username

Submit Query

Don't have an account? [Create your password!](#)

Home

Blacklisted Domain Check

Blacklisted IP Check

DNS ISP Cached Lookup

DNS Tools

Email Tools

Get Someones IP

IP Lookup

Ping

Proxy Checker

Proxy Lists

Reverse DNS Lookup

Reverse IP Lookup

Speed Test

Traceroute

Whois

Lookup IP address | Trace IP

199.41.253.14

Submit Query

199.41.253.14

Submit Query

ISP:

DHLS Systems

Host Name:

199.41.253.14

Organization:

A

City:

Burlingame

Country:

United States 

Country code:

US

Latitude:

37.5671

Longitude:

-122.371

Region/State:

CA

Topics

[What's this \(FAQ\)](#)

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[Hosting Neighbors](#)

[Blacklist IP check](#)

[Hide IP Address](#)

[Blog](#)

[sysadmin.mud](#)

1.3k

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IP Vulnerabilities. Get Free
Check!



Direct Link: <http://www.myiptest.com/staticpages/index.php/IP-Lookup/199.41.253.14>

<http://www.myiptest.com/staticpages/index.php/IP-Lookup/199.41.253.14>

9/11/2015

D

**Exhibits to Plaintiff's Supplemental Memorandum
in Opposition to Defendants Deutsche Post International B.V.
and DHL Supply Chain Netherlands B.V.'s Motion to Dismiss
Pursuant to Fed. R. Civ. P. 12(b)(2); Declaration of Rajiv Dugal
(February 2, 2016)**

District Court Docket # 51

Blog Add-ons IP Search

MyIpTest.com

Submit Q

 username

Submit Q

Don't have an account? [Create your password?](#)

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[Proxy Lists](#)
[Reverse DNS Lookup](#)
[Reverse IP Lookup](#)
[Speed Test](#)
[Traceroute](#)
[Whois](#)

Lookup IP address | Trace IP

199.41.253.14 Submit Query

ISP: DHL Systems
 Host Name: 199.41.253.14
 Organization: A
 City: Burlingame
 Country: United States
 Country code: US
 Latitude: 37.6071
 Longitude: -122.371
 Region/State: CA

Topics
[What's this \(FAQ\)](#)

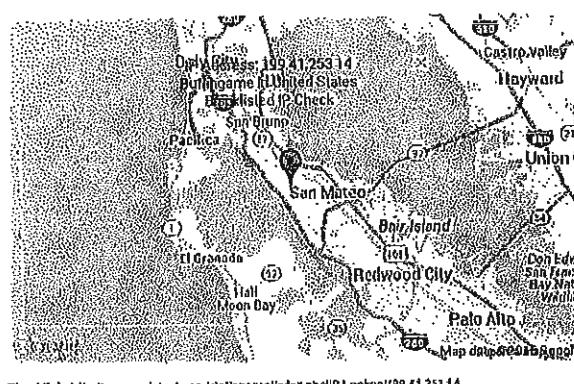
Friend Sites

[Hosting Neighbors](#)
[Blacklist IP check](#)
[Hide IP Address Blog](#)
[sysadmin.mud](#)

 1.3k
Like

IP Check: Free

Accurate, Fast Detection of
 IP Vulnerabilities. Get Free
 Check!



Direct link: <http://www.myiptest.com/staticpages/index.php/IP-Lookup/199.41.253.14>

<http://www.myiptest.com/staticpages/index.php/IP-Lookup/199.41.253.14>

9/11/2015

-----Original Message-----

From: Padraic Keaveney [mailto:pkeaveney@dexeurope.com]

Sent: Wednesday, May 28, 2014 9:00 AM

To: Roberto Abrahan; Rajiv Duggal

Cc: DEX Technology

Subject: RE: DHL VPN US Circuit - VPN Down Needs Immediate Action

Hi Roberto,

I have seen this since this morning..

On the advice of Rajiv,

I have requested Laura to open a case with DHL IT as there seems to be some issue on the DHL end (in the US) that is causing this error.

Laura, has requested further clarification from us on this and I will try and provide this to her by this evening.

We did have a printer issue in the morning time which I could not resolve and I had to call on the services of Rajiv to assist and resolve.

I was not able to login to the clec2 server as the login password was changed and I did not know it and thus unable to restart cups or perform any connectivity tests to the printers.

Once the clec2 issue was resolved by Rajiv, printing resumed here in Europe and this was confirmed by Hans (Venlo) and Gunther (BE).

Regards,

Padraic

WB 11

Deutsche Post DHL

xVPN Request

xVPN Request

Business Unit and Other Information

Business Unit	DSC
Business Region	Mainland Europe
Country	Netherlands
Sales Order (Work Package) Number	15012825
Project Name	N.A.

Customer Information

Customer Reference (e.g., Customer, Partner or External)	DEX
Company Name	DEX (Data Exchange Corp.)
Address	3600 Via Pescador
City	Camarillo
State	CA
Postal Code/ZIP	93012
Country	United States
Phone	

Customer Information - Primary Business Contact

Name	Rajiv Duggal
Function	
Phone	805-312-3499
Email	rduggal@dexsystems.com

DHL Link Requester

Name	Gerard Van Seumeren
Phone	+31 20 6555645
Email	Gerard.vanSeumeren@dhl.com
Service Desk Group	

DHL Link Request Owner

Name	Mark Kruyzen
Job Title	Service Level Manager
Department	IT Benelux
Phone	+31 6 52013749
Email	mark.kruyzen@dhl.com
Business Division	V7, Supply Chain
Service Desk Group	

ELR Requirements

Please specify ELR expiration date	12.02.2015
Average traffic throughput	
Unit	
Max. traffic throughput	
Unit	
Maximum number of Concurrent Connections (optional)	

Business Case

Business Case	DHL and DEX work in partnership to provide a complete end to end solution for reverse logistics business of Plantronics, a new customer in Beringe. Warehouse system is provided by DEX
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Attached Supporting Documents

Document Name	File Name
Not specified	

Data Classification

"C"

Resp. Supp. App. 20

Data types							
Data type	Data Classification For Internal Use						
Web Access to application and Print output from application							
Data Regulations None							
Additional Information							
Additional Information							
Admin Additional Information							
Admin Important Information							
Admin Additional Info							
Document Name	File Name						
Not specified							
Request Name	DEXPHX005						
Request Id	130212-XVP-7532						
Workflow Status	Pending Security Approval						
Task Progress	Assigned						
Request Type	4						
Creation Date	2013-02-12T14:55:05						
Archive	No						
Priority	Normal						
New/Update	False						
Submission							
By submitting this ELR, I confirm that I have read and agreed with the above	Y						
I confirm that the Service Owners of services in scope of this ELR provided their approval for implementation	Y						
Approvals							
List of Approvals:							
Approval Type	Approved	Emails	Approved By	Role	Date	Note	
Technical Approval	Y	AMIS_TS_Security@dhl.com	dwimberl	ELM Member	26/06/2013 19:38:58		
Security Approval	N	todd.luther@t-systems.com bryon.reynolds@t-systems.com		Security Approver			
Financial Approval	Y			Financial Approver		Not required yet	
Implementation	N	AMIS_TS_Security@dhl.com		ELM Member			
PIR for Requester	N			Requester			
PIR for SA	N	elm.netmaster@dhl.com		SA			
Readers & Notifications							
List of people who can access this request							
Name	Email	Role					
Pieter Oudenhoven	pieter.oudenhoven@dhl.com	Senior Network Specialist					
List of service owners who can receive notifications							
Name	Email	Role					
Not specified							
DHL Link Secondary Contact							
Name	Eugene Bijsterveld						
Job Title	Application Analyst						
Department	IT Benelux						
Phone	+31 6 53332693						
Email	Eugene.Bijsterveld@dhl.com						
Business Division	V7, Supply Chain						
Service Desk Group							

Non-Disclosure Agreement

Attach Non-Disclosure Agreement (NDA)					
Document Name	File Name				
NDA DEX -DHL	NDA DEX for VPN.pdf				
This Version Description					
Communication Matrix/Network Diagrams					
Communication Matrix/Network Diagrams					
Document Name	File Name				
Not specified					
Primary Gateways					
Primary Gateway					
Gateway	External IP Address (Routable, No NAT)				
Primary DHL Gateway	199.41.253.14				
Primary Remote Gateway	72.67.208.180				
Make and Model					
Juniper					
Cisco 2911					
Encryption Domain					
Remote IP Address/Network	DHL IP Address/Network				
7.250.77.160/29	199.41.0.0/22				
Secondary Gateways					
Is redundant VPN needed?	No				
Secondary Gateway					
Gateway	External IP Address (Routable, No NAT)				
Secondary DHL Gateway					
Secondary Remote Gateway	72.67.208.180				
Make and Model					
	Cisco 2911				
Encryption Domain					
Remote IP Address/Network	DHL IP Address/Network				
10.1.0.0/16					
IKE					
IKE Phase I - II					
IKE Phase	Encryption Algorithm	Hash Algorithm	PFS Diffie Hellman Group	Lifetime	
Phase 1	AES 256 - Recommended by DHL	SHA-1 - Recommended by DHL	2 - Recommended by DHL	Other - 28800	
Phase 2	AES 256 - Recommended by DHL	SHA-1 - Recommended by DHL	2 - Recommended by DHL	3600s - Recommended by DHL	
NAT Rules					
NAT Rules					
Customer IP	Customer Translated IP				
Not specified					
Segmentation Firewall					
Are the DHL servers behind a firewall on the internal network?	No				
Firewall Hostname					
Access Control					
Access Control					
Source - Destination					
Id	Source IP Address / Host Name	Source Translated IP	Destination IP Address / Host Name	Destination Translated IP	Protocol
2	1. 7.250.77.160/29 -		1. 2.31.40.73 - 2. 2.31.40.79 - 3. 2.31.40.61 - 4. 2.31.40.67 - 5. 198.141.83.91 - 6. 198.141.83.92 - 7. 198.141.83.93 - 8. 198.141.83.94 - 9. 198.141.83.95 - 10. 198.141.83.96 - 11. 198.141.83.97 - 12. 198.141.83.98 -	1. 199.41.3.140 2. 199.41.3.141 3. 199.41.3.142 4. 199.41.3.143 5. 199.41.3.144 6. 199.41.3.145 7. 199.41.3.146 8. 199.41.3.147 9. 199.41.3.148 10. 199.41.3.149 11.	1. JetDirect,TCP,9100 2. LPD,TCP,515 3. IPP,TCP,631

Id	Source IP Address / Host Name	Source Translated IP	Destination IP Address / Host Name	Destination Translated IP	Protocol
			13. 10.162.18.55 - 14. 10.162.18.56 - 15. 10.162.18.57 - 16. 10.162.18.58 - 17. 10.162.18.53 - 18. 10.162.18.67 - 19. 10.162.18.68 - 20. 10.162.18.69 - 21. 198.141.83.77 - 22. 198.141.83.85 - 23. 198.141.83.86 - 24. 10.162.18.71 -	199.41.3.150 12. 199.41.3.151 13. 199.41.3.152 14. 199.41.3.153 15. 199.41.3.154 16. 199.41.3.155 17. 199.41.3.156 18. 199.41.3.157 19. 199.41.3.158 20. 199.41.3.159 21. 199.41.3.160 22. 199.41.3.161 23. 199.41.3.162 24. 199.41.3.163	

CMDB

Id	CMDB Service Name	CMDB Service Owner
2		

Notes

Id	Notes
2	

Related requests

Related Requests	
Id	Name
	Notspecified

Stuart Young

From: Rajiv Duggal
Sent: Monday, February 01, 2016 11:33 AM
To: Stuart Young
Subject: FW: Suggested Source Network
Attachments: DEXPHX005.pdf

From: David.Wimberley@t-systems.com [mailto:David.Wimberley@t-systems.com]
Sent: Friday, June 28, 2013 9:40 AM
To: Rajiv Duggal <rduggal@dexsystems.com>
Subject: FW: Suggested Source Network

Hi Rajiv,
I am the Network Security Engineer for DPS Dynamic Platform Services (DPS) DCLAN, NA.
I am David Wimberley
App 701 E Hartford Dr
Scottsdale, AZ 85255
480-477-7024 (Phone)
+1 602-503-8996 (Mobile)
E-mail: David.Wimberley@T-Systems.com
<http://www.t-systems.com>

From: Wimberley, David
Sent: Wednesday, June 26, 2013 10:54 AM
To: Rajiv Duggal
Cc: Gerard.vanSeumeren@dh1.com; GARCIA HUERTA, CARLOS AARON
Subject: RE: Suggested Source Network

Hi Rajiv,

That's good news. I've attached the completed document which we are now submitting for security approval. (No problems expected). I expect we should have the VPN configured by COB tomorrow. I'll send the PSK in a separate email message. In case there are technical issues, I'll send a calendar invitation for a troubleshooting session on Friday morning. Let me know if you have questions.

Regards,
David

T-Systems North America, Inc.
GDU Dynamic Platform Services (DPS) DCLAN, NA
David Wimberley
Network Security Engineer
8701 E Hartford Dr
Scottsdale, AZ 85255
+ 1 480-477-7024 (Phone)
+ 1 602-503-8996 (Mobile)
E-mail: David.Wimberley@T-Systems.com
<http://www.t-systems.us.com>

From: Rajiv Duggal [mailto:rduggal@dexsystems.com]

Sent: Tuesday, June 25, 2013 6:04 PM

To: Wimberley, David

Cc: Gerard.vanSeumeren@dhl.com

Subject: RE: Suggested Source Network

Hi David,
Resp. Supp. App. Thanks

Rajiv

We will need to make some changes on our end and will be working on it.

From: David.Wimberley@t-systems.com [mailto:David.Wimberley@t-systems.com]

Sent: Tuesday, June 25, 2013 12:58 PM

To: David.Wimberley@t-systems.com; Rajiv Duggal

Cc: Gerard.vanSeumeren@dhl.com

Subject: RE: Suggested Source Network

Hi Rajiv,

How are you? I haven't seen a response.

Regards,
David

T-Systems North America, Inc.
GDU Dynamic Platform Services (DPS) DCLAN, NA
David Wimberley
Network Security Engineer
8701 E Hartford Dr
Scottsdale, AZ 85255
+ 1 480-477-7024 (Phone)
+ 1 602-503-8996 (Mobile)
E-mail: David.Wimberley@T-Systems.com
<http://www.t-systems.us.com>

From: Wimberley, David
Sent: Wednesday, June 12, 2013 3:36 PM
To: rduggal@dexsystems.com
Cc: Gerard Van Seumeren (DHL NL)
Subject: Suggested Source Network

Hi Rajiv,

The suggested 7.x network to NAT your source addresses to would be 7.250.77.160/29. Let me know if this workable for you.

Resp. @ Gerard,

App. Regards,
David

T-Systems North America, Inc.
GDU Dynamic Platform Services (DPS) DCLAN, NA
David Wimberley
Network Security Engineer
8701 E Hartford Dr
Scottsdale, AZ 85255
+ 1 480-477-7024 (Phone)
+ 1 602-503-8996 (Mobile)
E-mail: David.Wimberley@T-Systems.com
<http://www.t-systems.us.com>

Stuart Young

From: Rajiv Duggal
Sent: Tuesday, February 02, 2016 10:47 AM
To: Stuart Young
Subject: FW: Suggested Source Network

From: Rajiv Duggal
Sent: Tuesday, July 02, 2013 11:45 AM
To: David.Wimberley@t-systems.com
Cc: GARCIA HUERTA, CARLOS AARON <Carlos.Aaroon.Garcia@t-systems.com>; Gerard.vanSeumeren@dh1.com; Rajiv Duggal <rduggal@dexsystems.com>
Subject: RE: Suggested Source Network

Good news ! On a retest of the Europe VPN that is reaching out to the printers as well.

Thanks everyone for your help. We have both of the new VPN's operational at this time.

App. Best Regards,

Rajiv Duggal
Director, IT Operations
DEX - Optimal Solutions for the Technology Supply Chain
Office: 805-388-1711 x 528 | Cell: 805-312-3499
Email: rduggal@dex.com | www.dex.com

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From: David.Wimberley@t-systems.com [mailto:David.Wimberley@t-systems.com]
Sent: Tuesday, July 02, 2013 10:56 AM
To: Rajiv Duggal
Cc: GARCIA HUERTA, CARLOS AARON; Gerard.vanSeumeren@dh1.com
Subject: RE: Suggested Source Network

Hi Rajiv,

Signon_Audit_Forms_190515

Form Audit Report

19-MAY-15 16:00

Page: 1

User Name:
19-MAY-15

From Active Date:

19-MAY-15
Responsibility Name:

To Active Date:

Form Name:

User Name	End Active Time	Form Name	Responsibility Name	Start Active Time
GMELIS			BLO Inventory	19-MAY-15 14:17
19-MAY-15 14:29		Inventory Transactions		
GMELIS			BLO Inventory	19-MAY-15 14:22
19-MAY-15 14:23		DEXINVIQ		
TZHAO			PLT Shipping Super User	19-MAY-15 07:36
19-MAY-15 07:36		CARRPICK		
TZHAO			PLT Shipping Super User	19-MAY-15 07:35
19-MAY-15 07:36		SHIPDOCK		
TZHAO			PLT Shipping Super User	19-MAY-15 07:36
19-MAY-15 07:36		PICKSMRY		

PROOF OF SERVICE

STATE OF CALIFORNIA

COUNTY OF VENTURA

My business address is in Ventura County CA. I am over the age of eighteen and not a party to the within action. My business address is 3600 Via Pescador, Camarilla CA 93012

On February 2, 2016, I served the foregoing document(s) described as:

**SUPPLEMENTAL MEMORANDUM IN OPPOSITION TO DEFENDANTS'
MOTION DISMISS to:**

10 Anthony White, Thompson Hine LLP, 41 S. High St. Suite 1700, Columbus Ohio
11 43215

12 John Conkle, Conkle Kremer & Engel, 3130 Wilshire Blvd Suite 500 Santa Monica
13 CA 90403

14 XX (BY CM/ECF NOTICE OF ELECTRONIC FILING : I caused said documents
15 to be served by means of this Court's electronic transmission of the Notice of
16 Electronic Filing through the Court's transmission facilities to the parties and/or
17 counsel who are registered CM/ECF Users set forth in the service list obtained from
18 this Court.

19 XX (STATE) I declare under penalty of perjury under the laws of the United States
20 of America that the foregoing is true and correct and that I am employed in the office
21 of a member of the bar of this Court at whose direction the service was made.

22 **XX (FEDERAL)** I declare that I am a member of the bar of this Court.

23 | Executed on February 2, 2016, at Camarillo, California.

25 S/ _____

26 | C. Stuart Young