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6 Attorneys for Defendants NSO GROUP
7 TECHNOLOGIES LIMITED and Q CYBER
8 TECHNOLOGIES LIMITED

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 WHATSAPP INC., a Delaware
13 corporation, and FACEBOOK, INC., a
14 Delaware corporation,

15 Plaintiffs,

16 v.

17 NSO GROUP TECHNOLOGIES
18 LIMITED and Q CYBER
19 TECHNOLOGIES LIMITED,

20 Defendants.

Case No. 3:19-cv-07123-JSC

**DECLARATION OF SHALEV
HULIO IN SUPPORT OF
DEFENDANTS NSO GROUP
TECHNOLOGIES LIMITED
AND Q CYBER TECHNOLOGIES
LIMITED'S APPLICATION TO
SET ASIDE DEFAULT AND TO
ENLARGE TIME TO FILE
RESPONSIVE PLEADING TO
COMPLAINT**

Date: April 16, 2020
Time: 9:00 a.m.
Ctrm: E

Action Filed: 10/29/2019

1 I, Shalev Hulio declare as follows:

2 1. I am over the age of 18 and a citizen and resident of the State of Israel.
3 This Declaration is made in support of the application of NSO Group Technologies
4 Limited (“NSO Group”) and Q Cyber Technologies Limited to vacate a default
5 entered by the United States District Court for the Northern District of California on
6 March 2, 2020, and to expand the time for Defendants to file a responsive pleading
7 to the Complaint. I have personal knowledge of the facts set forth below, except as
8 otherwise stated.

9 2. I am the Chief Executive Officer of NSO Group and its shareholder, Q
10 Cyber. Both NSO Group and Q Cyber are Israeli corporations with a principal place
11 of business in the State of Israel.

12 3. Q Cyber does not engage in any operational activity.

13 4. NSO Group innovates cyber solutions that NSO Group does not itself
14 use. NSO Group’s only customers are sovereign states and the intelligence and law
15 enforcement agencies of sovereign states, which use NSO Group’s products in
16 furtherance of their national security interests and to conduct law enforcement
17 activities, such as combatting terrorism and investigating and prosecuting child
18 exploitation and other serious crimes. NSO Group’s only activities are to assist its
19 customers with implementing the system (at the customer’s facility) and to provide
20 basic technical support—activities in which NSO Group completely follows the
21 directions and specifications of its customers. None of NSO Group’s activities
22 involve any support to any operational activity by any NSO Group customer.

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1 5. NSO Group products sold to foreign sovereigns cannot be used to
2 conduct cybersurveillance within the United States.

3 I declare under the penalty of perjury and the laws of the United States that
4 the foregoing is true and correct this 6th day of March 2020, at Tel Aviv, Israel.

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8 SHALEV HULIO
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