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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

ANURAG GUPTA and by and through
him, D.G. and V.G., his minor children,,

Plaintiff,

v.

AERIES SOFTWARE, INC.,

Defendant.

CASE NO. 8:20-cv-00995-FMO-ADS

**DECLARATION OF JONATHAN
COTTON IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
SETTLEMENT**

DATE: June 14, 2021

JUDGE: Honorable Fernando M. Olguin

1 I, Jonathan A. Cotton, hereby declare as follows:

2 1. I am competent to testify to the matters stated herein. I submit this declaration in
3 support of the Motion for Preliminary Approval of Settlement filed by Plaintiffs
4 concurrently herewith.

5 2. I am the Executive Director of Operations at Aeries Software Inc. I have held this
6 position for 2.5 years. In my role as Executive Director of Operations, I am responsible for
7 day to day business operations, including all legal matters and was engaged in all aspects
8 of the investigation of the security incident that is the subject of this action.

9 3. Aeries conducted a full forensic investigation of this incident.


10 4. The investigation determined that on November 4, 2019, an unauthorized third-party
11 individual ran a script across the Aeries network as well as other locally hosted networks.
12 The script may have potentially exposed student names, California student ID numbers,
13 hashed passwords (not plain-text), and physical addresses for approximately 1 million
14 students.

15 5. The investigation also determined that the unauthorized individual gained access to
16 a database of information for students and parents associated with the San Dieguito Union
17 High School District in January 2020. Through this access, the unauthorized individual may
18 have gained access to additional information for approximately 98,199 individuals.

19 6. Specifically, the data that was potentially exposed for the San Dieguito Union High
20 School District population from this access included account usernames, hashed or
21 encrypted passwords, and certain medical information.

22 7. No other school district experienced such unauthorized access during the same time
23 period.

24 On this June 14th, 2021, at Orange County, California, I declare under penalty of
25 perjury under the laws of the United States of America that the foregoing is true and correct.
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Jonathan A. Cotton