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January 14, 2023

File

VIA EMAIL
(tudor.carsten@dlapiper.com)

Tudor Carsten
DLA Piper (Canada) LLP
Suite 6000, 1 First Canadian Place
100 King Street West
Toronto, ON M5X 1E2

Dear Tudor Carsten:

Re: Citizen Lab

We are counsel to the Citizen Lab, and we write in response to your letters of January 11 and 13, 2023. Please direct future correspondence on this matter to my attention.

We appreciate that you have just been retained, and that you may not have had an opportunity to be fully briefed by your client on this matter. To assist, we enclose an example email showing direct communications between Telinsol Ltd. and an Iranian telecommunications provider, in which they discuss the technical requirements of the Iranian regime's surveillance infrastructure, and how your client might assist in same.

The authenticity of these emails—which are dated in 2021, two years after you say that Telinsol Ltd. stopped communicating with its Iranian counterparty—has been verified by the Citizen Lab in the following manner:

1. The message domain key (DKIM) was valid, thus ensuring the cryptographic authentication of the message sender address and subject fields were not manipulated during transit;
2. There is no malicious content in the email;
3. The hops from sender and receiver servers are valid and registered; and
4. Header values are valid and consistent (no anomalies).

We also note that Telinsol Ltd., and its senior employees, appear to be in the process of scrubbing their public Internet profiles to remove references linking their work to Iran.

In light of your allegations of defamation and reference to considering "all available legal remedies", we trust that your client is preserving all communications, internal and external, related to its work in Iran. Please also confirm that Telinsol Ltd. and

their employees have saved copies of any online content that they changed after learning of Citizen Lab's work.

Yours very truly,
PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

A handwritten signature in black ink, appearing to read 'Ren Bucholz', with a horizontal line extending to the right.

Ren Bucholz
RB:SH

Encl.

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