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

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 OAKLAND DIVISION

11 WHATSAPP INC., a Delaware corporation,  
12 and FACEBOOK, INC., a Delaware  
corporation,

13 Plaintiffs,

14 v.

15 NSO GROUP TECHNOLOGIES LIMITED  
16 and Q CYBER TECHNOLOGIES LIMITED,

17 Defendants.

Case No. 4:19-cv-07123-PJH

**DECLARATION OF TAMIR GAZNELI  
IN SUPPORT OF DEFENDANTS'  
OPPOSITION TO PLAINTIFFS'  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT**

Action Filed: 10/29/2019

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20 **REDACTED VERSION OF DOCUMENT PROPOSED TO BE FILED UNDER SEAL**  
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1 I, Tamir Gazneli, declare as follows:

2 1. I am Tamir Gazneli, I have personal knowledge of the facts set forth herein, and  
3 except as otherwise stated, I could testify competently to each fact herein.

4 2. I am the Director of Research and Development at NSO Group. Based on my  
5 experience in that position, I am familiar with the operation of the Pegasus software, including the

6 [REDACTED]

7 [REDACTED] between April 2018 and May 2020.

8 3. The [REDACTED], in part, [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED] Rather, [REDACTED]

13 [REDACTED]

14 4. From the perspective of a Pegasus user, the [REDACTED]

15 [REDACTED]

16 [REDACTED]. In response, [REDACTED]

17 [REDACTED]. To

18 do so, [REDACTED]

19 [REDACTED].

20 5. Thus, although [REDACTED]

21 [REDACTED]

22 [REDACTED].

23 6. Each of NSO's government customers [REDACTED]

24 [REDACTED].

25 7. Those [REDACTED]

26 [REDACTED]

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[REDACTED]

[REDACTED].

8. Pegasus [REDACTED]

[REDACTED]

[REDACTED].

9. Neither the WhatsApp client nor WhatsApp servers [REDACTED]

[REDACTED]

[REDACTED]. That is why those [REDACTED].

10. The [REDACTED], but none of that

[REDACTED]. The [REDACTED].

The [REDACTED]

[REDACTED]. Pegasus did not alter, delete, impair, or corrupt any information on

WhatsApp servers.

11. When Pegasus [REDACTED]

[REDACTED]

[REDACTED]. Specifically, the [REDACTED]

[REDACTED]

[REDACTED]. WhatsApp [REDACTED]

[REDACTED]

[REDACTED].

12. When the [REDACTED]

[REDACTED]

[REDACTED].

13. NSO's government customers alone would operate Pegasus and make all decisions

about how to do so.

1 14. NSO never installed the Pegasus agent on the device of a non-consenting third  
2 party. NSO never used an installed Pegasus agent to obtain information from the device of a non-  
3 consenting third party.

4 I declare under penalty of perjury under the laws of the United States of America that the  
5 foregoing is true and correct. Executed on this 10<sup>th</sup> day of October 2024.

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TAMIR GAZNELI