

MOCK HEARING - SIMULATION ONLY

APEXGRID INFRASTRUCTURE, INC.'S EVIDENTIARY BRIEF

IN SUPPORT OF ITS CHALLENGE TO EXHIBITS 06 AND 07

Southbridge Technologies, Inc. v. ApexGrid Infrastructure, Inc.

PRELIMINARY STATEMENT

This case should not be decided by asking which email looks more convincing.

Exhibit 06 looks like an email from Laura Bennett. It contains familiar formatting, message headers, a quoted thread and a DKIM-Signature header. Exhibit 07 looks like an updated Order Form. If appearance were enough, the inquiry could end there.

It is not enough.

Before the 12:44:43 p.m. message date borne by Exhibit 06, Exhibit 04, Laura Bennett's Certidox-certified email addressed to Sarah Mitchell, stated that ApexGrid elected Option B and that Options C and D remained unselected. Exhibit 05, the certified PDF Order Form associated with that communication, reflects the same election.

(Exs. 04-05; Ex. 12 ¶¶ 8-9; Exs. 16, 18.)

That is only the beginning of the evidentiary difference.

The certified reference records do not depend solely on what a Certidox-generated verification display reports. They can be technically reconstructed and tested. Exhibit 16 independently reconstructs the exact certified PDF associated with Exhibit 05. Exhibit 18 independently reconstructs the certified email-content representation associated with Exhibit 04. Their payload hashes can be recalculated. Their manifests can be hashed. Those manifest hashes can be compared with the message imprints contained in DigiStamp RFC 3161 timestamp responses using independently available tools and DigiStamp trust material obtained independently of Certidox. Except for current certification status, that historical verification does not require reliance on the Certidox live verification display. **(Exs. 16, 18; Ex. 12 ¶¶ 6, 8-9, 14.)**

Then comes Exhibit 06.

Exhibit 06 purports to be a later outbound email from Laura Bennett's ApexGrid corporate mailbox, this time adding Options C and D. The parties stipulate that every outbound email sent from that mailbox was automatically certified through Certidox and generated its own separate Certidox certification record and QR code. **(Ex. 12 ¶ 5.)**

Exhibit 06 has no corresponding Certidox certification record and no Certidox QR code of its own. The QR code visible in the quoted earlier thread resolves to an earlier certification record, not to the purported 12:44:43 p.m. message. **(Ex. 12 ¶ 10.)**

Exhibit 21 provides a further system-record comparison. The parties stipulate that it accurately displays all Certidox document and email certification records associated with Laura Bennett's user account dated September 24, 2026. No certification record corresponding to the purported 12:44:43 p.m. Exhibit 06 communication appears in that history. (Ex. 21; Ex. 12 ¶ 14.)

Exhibit 07 presents the same B+C+D position. Unlike the certified Exhibit 05 A+B Order Form, it was not certified through Certidox and does not have an independently verifiable Certidox-certified reference chain. **(Exs. 05, 07; Ex. 12 ¶¶ 8, 11; Ex. 16.)**

ApexGrid asks the Neutral neither to find fraud nor to adopt a rule that uncertified records are false, but to do something narrower: test Exhibits 06 and 07 against the contemporaneous certified reference records and the evidentiary record as a whole, including the foundational facts stipulated in Exhibit 12.

When that is done, Exhibits 06 and 07 do not reliably establish a subsequent election of Options C or D by Laura Bennett.

ApexGrid therefore asks the Neutral to rely upon Exhibits 04 and 05 as the evidentiary record of ApexGrid's election, and to decline to rely upon Exhibits 06 and 07 as evidence of any subsequent election of Options C or D by Laura Bennett.

I. THE CONTRACTUAL AND EVIDENTIARY ISSUE PRESENTED

Exhibit 01 is the DocuSign contract package executed by ApexGrid Infrastructure, Inc. and Southbridge Technologies, Inc. on September 14, 2026. As originally executed, the Enterprise Services Order Form reflected Service A selected and Options B, C and D unselected. The Election Period expired at 12:00 p.m. Central Time on September 18, 2026. **(Ex. 01; Ex. 12 ¶ 2.)**

On September 24, Laura Bennett sent the extension request identified as Exhibit 02, asking Southbridge to extend the Election Period through 5:00 p.m. CDT that day. Southbridge received Exhibit 02. Sarah Mitchell responded in Exhibit 03 and agreed on behalf of Southbridge to extend the Election Period through 5:00 p.m. CDT. The parties stipulate that Laura Bennett and Sarah Mitchell possessed the authority necessary to make and accept that extension and that the extension was valid. **(Exs. 02-03; Ex. 12 ¶¶ 3-4.)**

The September 24 extension therefore made an additional election contractually possible. It does not establish that an additional election actually occurred.

The contractual opportunity to make a later election does not resolve the evidentiary question. The Neutral must determine what weight, if any, Exhibits 06 and 07 deserve as evidence that Laura Bennett actually made such a later election.

ApexGrid's position is that, when those records are tested against the complete evidentiary record, they do not reliably establish any subsequent election of Options C or D by Laura Bennett.

II. EXHIBITS 04 AND 05 FORM A CONTEMPORANEOUS, CRYPTOGRAPHICALLY LINKED A+B REFERENCE RECORD

The starting point is Exhibit 04.

Exhibit 04 records Laura Bennett electing Option B and expressly stating that Options C and D remain unselected.

Exhibit 05 is the corresponding certified Order Form. It shows Service A and Option B selected. Options C and D are not selected.

The two records are not simply consistent in substance. Their relationship is technically established.

Exhibit 18 records the SHA-256 of the PDF attachment to the certified Exhibit 04 email:
e90e117a63524859e834c4038c587de907c5e1b0c29367e213727cf93c59cd9e

Exhibit 18 does not contain the attachment bytes themselves. It contains protected attachment metadata, including that SHA-256. Independently calculating the SHA-256 of Exhibit 05 produces the same value. For purposes of this hearing, Exhibit 12 stipulates that this matching SHA-256 establishes that Exhibit 05 is byte-for-byte identical to the PDF attachment whose hash was recorded with Exhibit 04. (Ex. 12 ¶ 9; Ex. 18 at 8-9.)

The evidentiary consequence is precise: Exhibit 04 records Laura Bennett's A+B election and the SHA-256 of the PDF attached to that certified communication; Exhibit 05 is stipulated to be the exact file identified by that hash. The certified email and the certified Order Form thus form a cryptographically linked contemporaneous record of the same election.

Both reference records predate the 12:44:43 p.m. message date borne by Exhibit 06. (Ex. 06; Ex. 12 ¶¶ 8-10.)

That is the baseline against which the later records must be tested.

III. THE CERTIFIED ORDER FORM IS NOT A SCREENSHOT OR DATABASE ASSERTION; ITS EXACT BYTES CAN BE RECONSTRUCTED AND VERIFIED

Exhibit 16 is critical because it eliminates an obvious response: *“You are simply asking the Neutral to trust Certidox.”*

ApexGrid is asking for no such thing.

The independent verification chain begins with Exhibit 05 itself. The Certidox QR code appearing on Exhibit 05 can be decoded independently. It yields a verification identifier and reading key, and that reading key is identical to the value contained in `reading_key.txt` in the native Exhibit 16 verification bundle. The `certification_id` recorded in the corresponding `manifest.json` is

`c790931bc5a9e2b02f126c8507ee42ff1c222f69dfda9bd4f1beeb9445f45921c`. Using the reading key obtained from the QR code, the reviewing party can decrypt `document.enc` and reconstruct the certified reference document as `document.pdf`. The QR code therefore provides a direct technical path from Exhibit 05 to the verification material used to reconstruct its certified reference. **(Ex. 16 at 1-3.)**

The native Exhibit 16 verification ZIP is itself identified by SHA-256:

`7cefe496a376cbfb63c4ebd832d773914b4c33d361f56b26cbb715cd3c39a51d`

That hash identifies the exact native archive to be tested. **(Ex. 16 at 8.)**

Using that verified linkage, AES-256-GCM decryption of `document.enc` reconstructs the certified reference document as `document.pdf`.

The reconstructed PDF has SHA-256:

`e90e117a63524859e834c4038c587de907c5e1b0c29367e213727cf93c59cd9e`

That value matches `payload_sha256` in `manifest.json`.

The exact `manifest.json` then has SHA-256:

`3fe8ae11c52a862eb3d65b41988fb2a06ff24424051dfeb2e64a0a0851cc3b40`

That value matches the SHA-256 message imprint contained in `response.tsr`.

The DigiStamp RFC 3161 response records a `genTime` of **9:58:26.26 a.m. CDT on September 24, 2026. (Ex. 16 at 2.)**

The complete verification chain from the QR code on Exhibit 05 is therefore:

- verification identifier + reading key
- native Exhibit 16 verification bundle
- `document.enc`
- AES-256-GCM decryption
- reconstructed `document.pdf`
- payload SHA-256

- `payload_sha256` in `exact manifest.json`
- SHA-256 of `exact manifest.json`
- DigiStamp RFC 3161 message imprint in `response.tsr`

The chain therefore begins with the QR code appearing on Exhibit 05 and ends with independently verifiable RFC 3161 timestamp evidence over the exact manifest hash. (Ex. 16 at 1-3, 8.)

The exact certified PDF reconstructed through that process shows Service A and Option B selected and Options C and D unselected.

ApexGrid does not ask the Neutral to infer authenticity from the word “Certidox.”

ApexGrid asks the Neutral to perform, or permit an independent reviewer to perform, the cryptographic checks.

IV. EXHIBIT 18 PROVIDES A SECOND, SEPARATE TECHNICAL CHAIN FOR THE CERTIFIED EMAIL

The same principle applies to Exhibit 04.

Here again, the verification chain begins with the exhibit itself. The Certidox QR code embedded in Exhibit 04 can be decoded independently. It yields a verification identifier and reading key corresponding to the Exhibit 18 verification material. The `certification_id` recorded in `manifest.json` is `4fef01769d61f5f4c1f7fc93a61b8394cd55b92059a4956f05ff575efabcb81d`, and the reading key obtained from the QR code is the reading key contained in `reading_key.txt`. Using that key, AES-256-GCM decryption of `document.enc` reconstructs the certified email-content representation as `document.json`. The QR code thus provides a direct technical path from the email presented in Exhibit 04 to the independently reconstructible certified reference. **(Ex. 18 at 3-4.)**

The native Exhibit 18 verification ZIP is identified by SHA-256:

`0cf5339cc16c25e9772aabb924a5f36fd4559ecaa5b933386a9d09b5db90a61b`

That hash identifies the exact native archive to be tested. **(Ex. 18 at 10.)**

That reconstruction produces the certified email-content representation as `document.json`.

That reconstructed `document.json` has SHA-256:

`5518dcace7d4d9a118835298528ff1d057e03444ea14ce9f72359372546115c1`

That value matches `payload_sha256` in `manifest.json`.

The exact `manifest.json` has SHA-256:

389bc50a167c6cd7897935ef08c46cea196e3b1a51cb2a3e4826b13ebd645278

That value matches the SHA-256 message imprint contained in the DigiStamp RFC 3161 response.

The DigiStamp response records a `genTime` of **10:18:34.82 a.m. CDT on September 24, 2026. (Ex. 18 at 2.)**

The complete verification chain from the QR code embedded in Exhibit 04 is therefore:

- verification identifier + reading key
- native Exhibit 18 verification bundle
- `document.enc`
- AES-256-GCM decryption
- reconstructed `document.json`
- payload SHA-256
- `payload_sha256` in exact `manifest.json`
- SHA-256 of exact `manifest.json`
- DigiStamp RFC 3161 message imprint in `response.tsr`

Here again, the chain begins with the QR code carried by the exhibit itself and leads to independently reproducible verification of the certified reference and its associated timestamp evidence. (Ex. 18 at 2-4, 10.)

The reconstructed certified content records Laura Bennett as the From address, Southbridge as the recipient, the relevant order subject, and the message electing Option B while expressly stating that Options C and D remain unselected. It also contains protected attachment metadata.

The exact Exhibit 18 `manifest.json` also records Laura Bennett as the certifier, `lbennett@apexgrid-infra.com` as the certifier email address, and ApexGrid Infrastructure, Inc. as the certifying organization. Because those values form part of the exact manifest whose SHA-256 matches the message imprint contained in the DigiStamp RFC 3161 timestamp response, successful verification establishes that those recorded certifier values were contained in the manifest no later than the DigiStamp `genTime` and have not subsequently been altered without invalidating the timestamp verification. This does not, by itself, independently establish Laura Bennett's underlying human identity, personal authorship, authority or legal capacity. (Ex. 18 at 5.)

That is a separate evidentiary layer from the From field reconstructed in `document.json`: the certified payload records the message content and sender field, while the independently timestamped manifest protects the recorded certifier, certifier email and certifying organization values.

This is not a second copy of the same proof.

It is a second evidentiary chain.

Exhibit 16 reconstructs the certified Order Form.

Exhibit 18 reconstructs the certified email-content representation and records the attachment SHA-256 that independently matches Exhibit 05.

Two certified records therefore converge on the same A+B election, and the cryptographic linkage between them is independently testable.

V. THE BUNDLES PERMIT INDEPENDENT HISTORICAL VERIFICATION WITHOUT RELIANCE ON A CERTIDOX-GENERATED DISPLAY

The evidentiary significance of Exhibits 16 and 18 is reproducibility rather than deference to a Certidox-generated display.

After preserving the native ZIP unchanged, a reviewer can verify its SHA-256, work from a copy, decrypt the encrypted payload, calculate the reconstructed payload hash, compare it with `payload_sha256`, calculate the hash of the exact manifest, and compare that value with the RFC 3161 message imprint in `response.tsr`. **(Exs. 16, 18; Ex. 12 ¶¶ 6, 14.)**

The supplied decryption and timestamp-verification scripts are readable. The underlying operations can be reproduced using independently available AES-256-GCM and RFC 3161 tools. DigiStamp trust material can be obtained independently of Certidox.
(Exs. 16, 18; Ex. 12 ¶¶ 6, 14.)

That distinction is fundamental.

The user-facing display is not the endpoint of the verification. Exhibits 15 and 17 show the user-facing verification layer for Exhibits 05 and 04. Exhibits 16 and 18 provide a separate independent technical layer through which the underlying historical evidence can be reconstructed and tested without reliance on a Certidox-generated verification display. (Exs. 15-18; Ex. 12 ¶ 14.)

Here, the historical reference evidence can be taken outside that interface and tested.

The Neutral does not have to accept: *“Certidox says this is the certified version.”*

The Neutral can ask: *“Do the bytes reconstruct? Does the payload hash match? Does the manifest hash match? Does the RFC 3161 token verify?”*

That is materially different evidence.

VI. THE TIMESTAMP EVIDENCE PRECEDES THE DISPUTED B+C+D MESSAGE

The temporal sequence is equally significant, but the distinct time values must be kept separate.

For Exhibit 05, the corresponding `manifest.json` records a Certidox certification-event time of **9:58:22 a.m. CDT**. The DigiStamp RFC 3161 response records a `genTime` of **9:58:26.26 a.m. CDT**, and its message imprint matches the SHA-256 of the exact manifest associated with the certified Exhibit 05 payload. (Ex. 12 ¶ 8; Ex. 16.)

For Exhibit 04, the reconstructed `document.json` records a message-date field of **10:18:30 a.m. CDT**. The corresponding `manifest.json` records a Certidox certification-event time of **10:18:32 a.m. CDT**. The DigiStamp RFC 3161 response records a `genTime` of **10:18:34.82 a.m. CDT**, and its message imprint matches the SHA-256 of the exact manifest associated with the certified Exhibit 04 email-content representation. (Ex. 12 ¶ 9; Ex. 18.)

Exhibit 06 bears a later message date of **12:44:43 p.m. CDT**. (Ex. 06; Ex. 12 ¶ 10.)

Thus, both independently verifiable manifest-to-RFC-3161 timestamp relationships predate the 12:44:43 p.m. message date borne by the disputed B+C+D email.

ApexGrid does not overstate the DigiStamp evidence.

DigiStamp does not directly timestamp `document.pdf` or `document.json`. It timestamps the message imprint corresponding to the SHA-256 of the exact manifest.

The payload is linked to that manifest because its independently calculated SHA-256 matches the `payload_sha256` recorded in the manifest.

Nor does DigiStamp independently attest to the accuracy of the Certidox certification-event time.

Those are proper limitations.

But the limitation should not obscure what the RFC 3161 evidence does establish: the exact manifest hash associated with each certified reference is independently timestamped, and that manifest identifies the hash of the reconstructed certified payload.

The record therefore contains independently issued DigiStamp time references over the exact manifest hashes, distinct from the Certidox-recorded certification-event times. (Ex. 12 ¶ 6; Exs. 16, 18.)

VII. EXHIBIT 06'S LACK OF CERTIFICATION IS RELEVANT, BUT NOT DISPOSITIVE

If Exhibit 06 merely lacked a Certidox QR code, that absence, standing alone, would prove little.

The relevant stipulated fact is more specific: every outbound email sent from Laura Bennett's ApexGrid corporate mailbox was automatically certified through Certidox and generated its own separate Certidox certification record and QR code. (Ex. 12 ¶ 5.)

Exhibits 02, 04 and 10, the other relevant outbound Laura Bennett emails on September 24, each bear their own Certidox certification. (Ex. 12 ¶¶ 7, 9, 12; Exs. 14, 18.)

Exhibit 06 is different. It purports to be another outbound email from the same mailbox, but has no corresponding Certidox certification record and no Certidox QR code of its own. The QR code visible in the quoted thread belongs to the earlier Exhibit 02. (Ex. 12 ¶ 10.)

Exhibit 21 adds a separate system-record layer. For purposes of this hearing, the parties stipulate that Exhibit 21 accurately displays all Certidox document and email certification records associated with Laura Bennett's user account dated September 24, 2026. It displays the certification records associated with Exhibits 02, 05, 04 and 10, but no certification record corresponding to the purported 12:44:43 p.m. Exhibit 06 communication. (Ex. 21; Ex. 12 ¶ 14.)

The certification data underlying that history are stored in encrypted form. Access to the "My documents" certification history associated with Laura Bennett's user account requires authentication to that account, and Laura Bennett was the only authorized user of that account. (Ex. 12 ¶ 14.)

Exhibit 12 expressly provides that this absence, standing alone, does not establish that Exhibit 06 is false. ApexGrid relies on it as one element of the comparative evidentiary record, not as standalone proof of falsity. (Ex. 12 ¶ 13.)

VIII. THE QR CODE VISIBLE IN EXHIBIT 06 DOES NOT CERTIFY THE PURPORTED 12:44:43 P.M. MESSAGE

Exhibit 06 contains a Certidox QR code visually embedded in the quoted email history.

That could easily mislead a casual reader into believing the disputed message itself carries Certidox certification.

It does not.

The purported 12:44:43 p.m. message has no Certidox QR code of its own.

Independent verification resolves the visible QR code to the certification record associated with the earlier Exhibit 02 communication, not to the purported later B+C+D message. **(Ex. 06; Ex. 12 ¶ 10.)** See also Ex. 20 at 2 (demonstrative comparison).

That distinction illustrates why appearance is inadequate.

A QR code may be visually present on a page while technically belonging to an earlier quoted communication.

The relevant question is not: *“Is there a Certidox QR somewhere on the page?”*

It is: *“Which certification record does this QR identify, and what exact content does that record certify?”*

Certidox permits that question to be answered.

IX. THE DKIM-SIGNATURE HEADER DOES NOT RESOLVE THE AUTHENTICATION ISSUE

ApexGrid also does not ask the Neutral to ignore the DKIM-Signature header appearing in Exhibit 06.

It should be considered for exactly what the stipulated record establishes.

Exhibit 06 contains a DKIM-Signature header.

Exhibit 12 stipulates only that the header appears in Exhibit 06; it does not stipulate that the DKIM signature is cryptographically valid or that it establishes the authenticity, origin or authorship of the purported message. **(Ex. 06; Ex. 12 ¶ 10.)**

Southbridge therefore cannot convert the appearance of a DKIM-Signature field into stipulated cryptographic authentication.

By contrast, Exhibits 04 and 05 are supported by reproducible technical verification paths through Exhibits 16 and 18: the certified payloads can be reconstructed, their hashes recalculated, the exact manifests tested, and the RFC 3161 timestamp evidence independently verified. **(Exs. 16, 18; Ex. 12 ¶ 14.)**

That is a materially different evidentiary posture.

X. EXHIBIT 07 DOES NOT HAVE THE SAME INDEPENDENTLY VERIFIABLE EVIDENTIARY FOUNDATION AS EXHIBIT 05

The dispute does not end with the email.

The B+C+D Order Form, Exhibit 07, must also be evaluated.

Exhibit 05 shows Service A and Option B selected, with Options C and D unselected. It was certified through Certidox. Through Exhibit 16, its exact certified PDF can be independently reconstructed. Its SHA-256 matches the PDF-attachment SHA-256 recorded in the certified email-content representation associated with Exhibit 04, and Exhibit 12 stipulates that this match establishes byte-for-byte identity. **(Exs. 04-05; Ex. 12 ¶¶ 8-9; Exs. 16, 18.)**

Exhibit 07 shows Service A and Options B, C and D selected. It was not certified through Certidox, and no corresponding Certidox document-certification record exists for it. **(Ex. 07; Ex. 12 ¶ 11.)**

That absence, standing alone, does not establish that Exhibit 07 is false, and ApexGrid does not contend that every Order Form was required to be separately certified. **(Ex. 12 ¶¶ 11, 13.)**

The point is comparative evidentiary weight. Exhibit 05 has an independently reconstructible, cross-linked and independently timestamp-verifiable certified reference chain. Exhibit 07 does not.

Accordingly, Exhibit 07 does not provide the same independently verifiable evidentiary foundation for a purported later B+C+D election that Exhibit 05 provides for the contemporaneous A+B election.

XI. THE SUBSEQUENT DOCUMENTARY SEQUENCE PROVIDES CORROBORATING CONTEXT

The subsequent documentary sequence is equally clear. Exhibit 08 is Southbridge's invoice based on Service A plus Options B, C and D. Exhibit 09 is Sarah Mitchell's email transmitting that invoice and stating that it reflects Service A plus Options B, C and D. **(Exs. 08-09.)**

Exhibit 10 is Laura Bennett's Certidox-certified response to the invoice. It states that ApexGrid elected Option B only and that Options C and D were not selected and remain unselected. Exhibit 10 bears its own Certidox QR code and has its own separate Certidox certification record. **(Ex. 10; Ex. 12 ¶ 12.)**

In Exhibit 11, Sarah Mitchell responds to Exhibit 10 by relying upon and producing Exhibits 06 and 07 as Southbridge records supporting Southbridge's position that ApexGrid elected Options B, C and D. **(Ex. 11; Ex. 12 ¶ 12.)**

ApexGrid does not offer Laura's later statement as independent proof of what happened earlier.

Nor does Sarah Mitchell's subsequent reliance prove that she created or knowingly used false records.

The relevance is corroborative.

Laura's later position is consistent with the contemporaneous certified reference record.

Southbridge's contrary position depends on Exhibits 06 and 07, the very records whose authenticity and evidentiary weight are at issue.

The technical evidence existed before that dispute became explicit.

Exhibit 10 is a later outbound Laura Bennett email that likewise bears its own Certidox certification. **(Ex. 10; Ex. 12 ¶ 12.)**

That sequence provides corroborating context for the evidentiary comparison between the certified A+B records and Exhibits 06 and 07.

XII. SOUTHBRIDGE'S BEST ARGUMENTS DEFINE THE LIMITS OF THE EVIDENCE; THEY DO NOT EXPLAIN THE CONFLICT

Southbridge can identify genuine limitations in the evidence:

- A later election was contractually possible.
 - An uncertified record can be authentic.
 - Different SHA-256 values establish difference, not falsification.
 - Exhibit 18 reconstructs the certified email-content representation as `document.json`, not the native `.eml` file byte-for-byte.
 - DigiStamp timestamps the SHA-256 message imprint corresponding to the exact manifest, not the reconstructed payload directly.
 - Exhibit 21 is a Certidox service-side system record, not an independent cryptographic verification bundle.
- (Ex. 12 ¶¶ 6, 13-14.)**

ApexGrid accepts each of those limitations, but none resolves the evidentiary conflict presented here: **Where is the Certidox certification record corresponding to the purported 12:44:43 p.m. Laura Bennett email?**

There is none.

Nor does any corresponding record appear in the stipulated September 24 certification history displayed in Exhibit 21. **(Ex. 21; Ex. 12 ¶ 14.)**

Southbridge is right that no single fact is dispositive, but the evidentiary force here is cumulative:

- the certified A+B records are independently verifiable (**Exs. 16, 18**);
- Exhibit 06 purports to be an outbound Laura Bennett email but has no corresponding Certidox certification record, no Certidox QR code of its own, and no corresponding record in the stipulated September 24 certification history displayed in Exhibit 21 (**Ex. 21; Ex. 12 ¶¶ 5, 10, 14**); and
- Exhibit 07 presents a materially different B+C+D Order Form and lacks the independently verifiable certified-reference chain supporting Exhibit 05.

Those facts must be weighed together, not in isolation.

XIII. THE PROBATIVE FORCE OF CERTIDOX LIES IN THE ARCHITECTURE, NOT IN ANY SINGLE FEATURE

Certidox contributes to a layered evidentiary architecture:

1. Positive contemporaneous evidence. Exhibits 04 and 05 are certified reference records reflecting the same A+B election before the authenticity dispute became explicit. (**Exs. 04-05; Ex. 12 ¶¶ 8-9.**)

2. Content integrity. The certified payloads associated with Exhibits 05 and 04 can be independently reconstructed and their SHA-256 values checked against the `payload_sha256` values recorded in their exact manifests. (**Exs. 16, 18; Ex. 12 ¶ 6.**)

3. Cross-record linkage. The SHA-256 of Exhibit 05 matches the PDF-attachment SHA-256 recorded in the certified email-content representation associated with Exhibit 04, and Exhibit 12 stipulates that the match establishes byte-for-byte identity. (**Ex. 12 ¶ 9; Ex. 18 at 8-9.**)

4. Independent timestamp evidence. The SHA-256 of each exact manifest can be verified against the message imprint contained in the corresponding DigiStamp RFC 3161 timestamp response. (**Exs. 16, 18; Ex. 12 ¶ 6.**)

5. Reproducibility. Except for current certification status, the historical reconstruction and timestamp verification can be repeated using independently available technical tools and DigiStamp trust material obtained independently of Certidox, without reliance on a Certidox-generated verification display. (**Exs. 16, 18; Ex. 12 ¶ 14.**)

6. Automatic certification workflow. Every outbound email sent from Laura Bennett's ApexGrid corporate mailbox was automatically certified through Certidox and generated its own separate Certidox certification record and QR code. (**Ex. 12 ¶ 5.**)

7. Negative certification evidence. Exhibit 06 has no corresponding Certidox certification record and no Certidox QR code of its own; the QR code visible in the quoted thread belongs to the earlier Exhibit 02. (Ex. 12 ¶ 10.)

8. User certification history. Exhibit 21 is a Certidox service-side system record that, by stipulation, accurately displays all Certidox document and email certification records associated with Laura Bennett’s user account dated September 24, 2026. It displays records associated with Exhibits 02, 05, 04 and 10, but no corresponding certification record for Exhibit 06. The underlying certification data are stored in encrypted form, and access to the “My documents” history requires authentication to Laura Bennett’s user account, of which she was the only authorized user. (Ex. 21; Ex. 12 ¶ 14.)

Taken together, these layers support the certified A+B reference records and materially distinguish them from Exhibits 06 and 07.

XIV. THE CHRONOLOGY SHARPENS THE EVIDENTIARY CONTRAST

The evidentiary sequence can be stated chronologically.

9:58:22 a.m. CDT. The `manifest.json` associated with Exhibit 05 records this Certidox certification-event time. The exact certified PDF reconstructed through Exhibit 16 shows Service A and Option B selected, with Options C and D unselected. Its SHA-256 is `e90e117a63524859e834c4038c587de907c5e1b0c29367e213727cf93c59cd9e`. (Ex. 12 ¶ 8; Ex. 16.)

9:58:26.26 a.m. CDT. The DigiStamp RFC 3161 response associated with Exhibit 05 records this `genTime`; its message imprint matches the SHA-256 of the exact `manifest.json` associated with the certified Exhibit 05 payload. (Ex. 12 ¶ 8; Ex. 16.)

10:18:30 a.m. CDT. The certified email-content representation associated with Exhibit 04 records this message-date field. It states that ApexGrid elects Option B and that Options C and D remain unselected. (Ex. 04; Ex. 12 ¶ 9; Ex. 18.)

10:18:32 a.m. CDT. The Exhibit 04 `manifest.json` records this Certidox certification-event time. (Ex. 12 ¶ 9; Ex. 18.)

10:18:34.82 a.m. CDT. The DigiStamp RFC 3161 response associated with Exhibit 04 records this `genTime`; its message imprint matches the SHA-256 of the exact `manifest.json` associated with the certified Exhibit 04 email-content representation. (Ex. 12 ¶ 9; Ex. 18.)

Exhibit 04 reflects an outbound ApexGrid email addressed to Southbridge. Its protected attachment metadata records the PDF attachment SHA-256

e90e117a63524859e834c4038c587de907c5e1b0c29367e213727cf93c59cd9e, the same SHA-256 independently calculated for Exhibit 05.

For purposes of this hearing, that matching SHA-256 establishes byte-for-byte identity between Exhibit 05 and the PDF attachment whose hash was recorded with Exhibit 04. **(Ex. 12 ¶ 9; Ex. 18 at 8-9.)**

12:44:43 p.m. CDT. Southbridge relies on Exhibit 06 as a later email from Laura Bennett stating that ApexGrid had added Options C and D, together with Exhibit 07, an Order Form showing Service A and Options B, C and D selected. **(Exs. 06-07; Ex. 12 ¶¶ 10-12.)**

The two records differ materially from the contemporaneous certified A+B records.

1. The Order Form. Exhibit 05, showing Service A and Option B selected and Options C and D unselected, was certified through Certidox, while Exhibit 07, produced by Southbridge in support of its B+C+D position, shows Service A and Options B, C and D selected and was not certified through Certidox. No corresponding Certidox document-certification record exists for Exhibit 07. **(Exs. 05, 07; Ex. 12 ¶ 11.)**

2. The email. Exhibit 06 is produced by Southbridge as a purported later email from Laura Bennett stating that ApexGrid had added Options C and D. Every outbound email sent from Laura Bennett's ApexGrid corporate mailbox was automatically certified through Certidox and generated its own separate Certidox certification record and QR code. **(Ex. 12 ¶ 5.)**
Exhibit 06 has no Certidox certification record and no Certidox QR code of its own. The QR code visible in the quoted thread belongs to the earlier Exhibit 02, not to the purported Exhibit 06 message. **(Ex. 12 ¶ 10.)**

Neither absence, standing alone, establishes that Exhibit 06 or Exhibit 07 is false. **(Ex. 12 ¶ 13.)**

6:04:02 p.m. CDT. Exhibit 10 is Laura Bennett's later Certidox-certified response to Southbridge's invoice. It states again that ApexGrid elected Option B only and that Options C and D were not selected and remain unselected. Exhibit 10 bears its own Certidox QR code and has its own separate Certidox certification record. **(Ex. 10; Ex. 12 ¶ 12.)**

XV. APEXGRID NEED NOT ESTABLISH FRAUD, PERSONAL AUTHORSHIP OR INTENT TO PREVAIL ON THE EVIDENTIARY ISSUE

ApexGrid does not ask the Neutral to determine who created or altered Exhibits 06 or 07, whether any person knew either record to be false or inauthentic, or whether any person acted with fraudulent intent. Exhibit 12 expressly leaves those matters unresolved. **(Ex. 12 ¶ 13.)**

Those ultimate questions are not necessary to decide the evidentiary issue presented here.

The question is whether Exhibits 06 and 07 reliably establish that Laura Bennett made an additional election of Options C and D. A record may fail that evidentiary test without the Neutral identifying who created it or why.

Here, the complete record materially undermines Exhibits 06 and 07 as proof of any such later election.

XVI. REQUESTED DETERMINATION

For the reasons set forth above, ApexGrid respectfully requests that the Neutral determine that:

- 1.** Exhibits 04 and 05 should be accorded substantial evidentiary weight as the contemporaneous, certified and independently verifiable record of ApexGrid's election of Service A and Option B, with Options C and D unselected.
(Exs. 04-05; Ex. 12 ¶¶ 8-9; Exs. 16, 18.)
- 2.** Exhibit 06 should not be credited as sufficient proof that Laura Bennett subsequently elected Options C and D. Exhibit 06 purports to be an outbound email from Laura Bennett's ApexGrid corporate mailbox, but has no corresponding Certidox certification record and no Certidox QR code of its own, although every outbound email sent from that mailbox was stipulated to be automatically certified through Certidox. In addition, Exhibit 21, which the parties stipulate accurately displays all Certidox document and email certification records associated with Laura Bennett's user account dated September 24, 2026, contains no record corresponding to Exhibit 06. **(Ex. 06; Ex. 21; Ex. 12 ¶¶ 5, 10, 14.)**
- 3.** Exhibit 07 likewise should not be credited as sufficient proof of an additional election by Laura Bennett. It reflects the disputed B+C+D position, but no independently verifiable Certidox record ties that version to any later election by Laura Bennett. By contrast, Exhibit 05 is independently reconstructible and is cryptographically linked to Laura Bennett's certified Exhibit 04 communication. **(Exs. 04-07; Ex. 12 ¶¶ 8-11; Exs. 16, 18.)**
- 4.** The complete evidentiary record does not establish that ApexGrid made any election of Options C or D after the certified A+B election reflected in Exhibits 04 and 05.
(Exs. 04-07, 21; Ex. 12 ¶¶ 5, 8-14.)

Accordingly, ApexGrid respectfully requests that the Neutral:

- **rely upon Exhibits 04 and 05 as the evidentiary record of ApexGrid's election;**
- **decline to rely upon Exhibits 06 and 07 as evidence of any subsequent election of Options C or D; and**
- **determine that the record establishes ApexGrid's election of Service A and Option B, and does not establish any later election of Options C or D by Laura Bennett.**

CONCLUSION

This hearing illustrates the difference between an electronic record that merely looks authentic and one whose evidentiary history can be independently tested.

Exhibits 16 and 18 permit independent reconstruction and verification of the certified A+B reference records reflected in Exhibits 04 and 05. Those records are mutually consistent, cryptographically linked and supported by independently verifiable timestamp evidence. **(Exs. 04-05, 16, 18; Ex. 12 ¶¶ 6, 8-9, 14.)**

Every outbound email sent from Laura Bennett's ApexGrid corporate mailbox was automatically certified through Certidox and generated its own separate certification record and QR code. Exhibit 06, although presented as a later outbound Laura Bennett email adding Options C and D, has neither. Exhibit 21 further provides the stipulated September 24 certification history for Laura Bennett's user account, and no corresponding record for Exhibit 06 appears in that history. Exhibit 07, the associated B+C+D Order Form, does not have the same independently verifiable evidentiary foundation as Exhibit 05. **(Exs. 06-07, 21; Ex. 12 ¶¶ 5, 10-11, 14.)**

Certidox does not tell the Neutral which record to believe. It makes the competing records testable.

ApexGrid therefore respectfully requests that the Neutral rely upon Exhibits 04 and 05 as the evidentiary record of ApexGrid's election and decline to rely upon Exhibits 06 and 07 as evidence that Laura Bennett subsequently elected Options C or D.