

ISSUES PRESENTED AND PARTY POSITIONS MOCK HEARING – SIMULATION ONLY

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

PURPOSE OF THIS DOCUMENT

This document is a reference document for the mock hearing.

Its purpose is to identify the principal evidentiary issues presented by the record and to summarize, in neutral form, the principal positions available to each party.

This document is not itself an exhibit, does not constitute a stipulation, and does not enlarge, modify, or supplement the evidentiary scope of any underlying exhibit.

The summaries below are intended to frame the dispute for adversarial presentation. They do not state findings of fact or conclusions of law.

I. EVIDENTIARY FRAMEWORK FOR THE MOCK HEARING

Contractual framework and extension

Exhibits 01 through 03 establish the contractual framework, the original September 18 Election Period deadline, and the September 24 request and agreement extending the Election Period through 5:00 p.m. CDT. Exhibit 12 separately stipulates the relevant authority, receipt and validity of the extension.

Certified reference records

- Exhibit 04 is Laura Bennett’s Certidox-certified email stating that ApexGrid elects Option B and that Options C and D remain unselected.
- Exhibit 05 is the separately Certidox-certified Enterprise Services Order Form showing Service A and Option B selected, with Options C and D unselected. Exhibit 12 stipulates that the matching SHA-256 establishes Exhibit 05 as byte-for-byte identical to the PDF attachment whose SHA-256 was recorded with Exhibit 04.

Disputed records and subsequent reliance

- Exhibit 06 is the disputed email bearing a 12:44:43 p.m. CDT message date and purporting to add Options C and D.
- Exhibit 07 is the associated disputed Order Form showing Service A and Options B, C and D selected.

- Exhibits 08 through 11 provide the billing context, Laura Bennett’s later certified rejection of the B+C+D position, and Sarah Mitchell’s subsequent reliance upon and production of Exhibits 06 and 07 as Southbridge records.

Foundational stipulation

Exhibit 12 contains the parties’ joint stipulation concerning the September 24 extension; the automatic certification of every outbound email sent from Laura Bennett’s ApexGrid corporate mailbox; the architecture and limitations of the independent-verification bundles; the certified-content and attachment-hash relationships among the relevant records; the absence of a corresponding Certidox certification record and QR code for Exhibit 06; the limited significance of the absence of a separate document-certification record for Exhibit 07; Southbridge’s receipt of Exhibits 02 and 10; and the scope and limitations of Exhibits 13 through 21.

User-facing verification evidence

Exhibits 13, 15 and 17 record the user-facing Certidox verification results associated with Exhibits 02, 05 and 04 respectively.

Independent technical verification

Exhibits 14, 16 and 18 provide corresponding, reproducible technical verification paths using independently available tools and independently issued DigiStamp RFC 3161 timestamp evidence.

Demonstrative comparison evidence

Exhibit 19 compares Exhibits 05 and 07. Exhibit 20 compares Exhibits 04 and 06. These demonstratives do not create or stipulate additional facts and do not enlarge the evidentiary effect of the underlying record.

System-record evidence

Exhibit 21 reproduces the Certidox “My documents” certification history displayed in Laura Bennett’s authenticated user account. Exhibit 12 stipulates that Exhibit 21 accurately displays all Certidox document and email certification records associated with that 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. Exhibit 21 is a Certidox service-side system record, not an independent cryptographic verification bundle.

EVIDENTIARY CONTRAST PRESENTED BY THE RECORD

The evidentiary contrast in this hearing is not simply between a certified record and an uncertified record. It is between contemporaneous reference records certified before the authenticity dispute became explicit, whose certified content can later be independently reconstructed and whose associated timestamp evidence can be independently verified, and disputed records that materially conflict with those references.

For Exhibit 06, that conflict is additionally evaluated against the stipulated rule that 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, together with the September 24 user certification history reflected in Exhibit 21, which contains no corresponding record for Exhibit 06.

The hearing therefore tests what evidentiary difference that combined record makes when parties present materially incompatible electronic records.

II. ISSUES PRESENTED

ISSUE 1 - AUTHENTICITY OF THE DISPUTED SEPTEMBER 24 RECORDS

The first issue is whether Exhibits 06 and 07 are authentic records of an additional election of Options C and D actually made by Laura Bennett on behalf of ApexGrid.

Exhibit 06 purports on its face to be an outbound email from Laura Bennett bearing a September 24, 2026, 12:44:43 p.m. CDT message date and stating that ApexGrid had decided to add Options C and D.

Exhibit 12 stipulates only to the presence of the header fields and DKIM-Signature header appearing in Exhibit 06. It does not stipulate their authenticity or provenance, that the DKIM signature is cryptographically valid, or that it establishes the authenticity, origin or authorship of the purported message.

Exhibit 07 is the associated Order Form showing Service A and Options B, C and D selected.

The existence of Exhibits 06 and 07 as records produced by Southbridge is not itself the issue. The issue is whether they authentically reflect a later communication and election actually made by Laura Bennett.

The neutral may consider, among other evidence:

- the certified reference records in Exhibits 04 and 05;
- the automatic outbound-email certification rule stipulated in Exhibit 12;

- the absence of a corresponding Certidox certification record and QR code of its own for Exhibit 06;
- the September 24 user certification history reflected in Exhibit 21 and the expressly stipulated limitations of that service-side system record;
- the material differences between Exhibits 05 and 07 and the absence of a separate document-certification record for Exhibit 07, subject to the limitations stipulated in Exhibit 12;
- the subsequent conduct of Laura Bennett and Sarah Mitchell;
- the user-facing and independent technical verification evidence; and
- the limitations expressly stated in Exhibit 12 and the individual exhibits.

Neither the existence of the disputed records nor their inconsistency with the certified reference records, standing alone, determines their authenticity. That question remains for the neutral on the complete evidentiary record.

ISSUE 2 - EVIDENTIARY WEIGHT OF THE CERTIFIED REFERENCE RECORDS

The second issue is what evidentiary weight should be assigned to Exhibits 04 and 05 as contemporaneous certified reference records.

Exhibit 04 is the Certidox-certified email stating that ApexGrid elects Option B and that Options C and D remain unselected. Exhibit 05 is the separately certified Enterprise Services Order Form showing Service A and Option B selected, with Options C and D unselected.

Both certified reference records predate the 12:44:43 p.m. message date borne by Exhibit 06. Exhibit 12 further stipulates that the matching SHA-256 establishes Exhibit 05 as byte-for-byte identical to the PDF attachment whose SHA-256 was recorded with Exhibit 04.

The neutral must nevertheless distinguish between two propositions.

First, Exhibits 04 and 05 establish a contemporaneous certified reference point reflecting an A+B election with Options C and D unselected.

Second, the existence of those certified records does not, by itself, logically establish that no later election could have occurred before the extended 5:00 p.m. CDT deadline.

The issue is therefore what weight those certified reference records should receive when evaluated against the disputed records and the remainder of the evidentiary record.

ISSUE 3 - SIGNIFICANCE OF THE AUTOMATIC CERTIDOX WORKFLOW, NEGATIVE RECORD EVIDENCE AND EXHIBIT 21

The third issue is what evidentiary significance should be assigned to the stipulated automatic outbound-email certification rule, the absence of a corresponding certification record and QR code of its own for Exhibit 06, and the September 24 user certification history reflected in Exhibit 21.

Exhibit 12 stipulates that 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. The certification process required no separate action by Laura Bennett.

Exhibit 06 has no corresponding Certidox certification record and no Certidox QR code of its own. The QR code visible within the quoted earlier thread resolves to the certification record associated with Exhibit 02, not to the purported 12:44:43 p.m. message.

Exhibit 12 further stipulates that Exhibit 21 accurately displays all Certidox document and email certification records associated with Laura Bennett's user account dated September 24, 2026. That history 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, access requires authentication to Laura Bennett's account, and Laura Bennett was the only authorized user of that account.

Exhibit 21 is a Certidox service-side system record, not an independent cryptographic verification bundle. It does not, by itself, establish that Exhibit 06 is false, determine authorship of any disputed record, or establish fraud, intent or ultimate evidentiary weight.

The parties likewise do not stipulate that the absence of a corresponding certification record for Exhibit 06, standing alone, establishes falsity. The issue is what evidentiary inference should be drawn from that absence when considered together with the stipulated automatic certification rule, Exhibit 21 and the remainder of the record.

ISSUE 4 - SIGNIFICANCE OF USER-FACING CERTIDOX VERIFICATION

Exhibits 13, 15 and 17 record user-facing Certidox verification results associated respectively with Exhibits 02, 05 and 04.

The issue is what evidentiary significance should be assigned to those verification results.

The user-facing exhibits provide a practical means of examining the certification information and certified content displayed by Certidox when the relevant QR codes are scanned.

They must, however, be confined to what they actually establish. They record what the Certidox interface displays. They do not, by themselves, establish receipt, underlying human authorship, the authenticity or falsity of a competing record, personal knowledge or fraudulent intent.

Current Certidox certification status must also be distinguished from historical integrity evidence. Current status is a live service-side value and is not interchangeable with the historical certified content, certification-event time or independently verified timestamp evidence.

The neutral should therefore distinguish the evidentiary significance of the displayed certification information from ultimate conclusions concerning authentication, provenance, authorship, intent and evidentiary weight.

ISSUE 5 - SIGNIFICANCE OF INDEPENDENT TECHNICAL VERIFICATION

Exhibits 14, 16 and 18 provide separate, reproducible technical verification paths for the certified evidence used in the hearing.

Exhibit 14 permits independent reconstruction and verification of the certified email-content representation associated with Exhibit 02.

Exhibit 16 permits independent reconstruction of the exact certified PDF associated with Exhibit 05.

Exhibit 18 permits independent reconstruction and verification of the certified email-content representation associated with Exhibit 04, including the protected attachment metadata recording the SHA-256 of the attached PDF.

The verification procedures permit examination of the relevant SHA-256 relationships, QR and reading-key linkage, manifest integrity and independently issued DigiStamp RFC 3161 timestamp evidence using independently available technical tools and DigiStamp trust material obtained independently of Certidox.

More specifically, the SHA-256 of the reconstructed payload is checked against the `payload_sha256` value recorded in `manifest.json`, and the SHA-256 of the exact `manifest.json` is checked against the message imprint contained in the DigiStamp RFC 3161 timestamp response. DigiStamp therefore timestamps the hash of the exact manifest, not the reconstructed payload directly, and does not independently attest to the accuracy of the Certidox certification-event time recorded in that manifest.

Except for current certification status, the historical reconstruction and timestamp-verification procedures do not require reliance on the Certidox live verification display. The

email-bundle procedures in Exhibits 14 and 18 also do not require access to the original mailbox or original mail server.

Those technical exhibits nevertheless have defined limits. Exhibits 14 and 18 reconstruct certified email-content representations as document.json; they do not reconstruct the native .eml files byte-for-byte. The email bundles also do not contain the attachment files themselves as separate attachment payloads.

The issue is what additional evidentiary weight, if any, should be assigned to the fact that the relevant certified content can be independently reconstructed and its cryptographic and timestamp relationships independently verified without reliance on a Certidox-generated verification display.

ISSUE 6 - SIGNIFICANCE OF THE DIFFERENCES BETWEEN EXHIBITS 05 AND 07 AND THE ABSENCE OF A SEPARATE DOCUMENT-CERTIFICATION RECORD FOR EXHIBIT 07

Exhibit 07 is the disputed Order Form associated with Exhibit 06. It shows Service A and Options B, C and D selected. Its SHA-256 differs from the SHA-256 of Exhibit 05 and from the PDF-attachment SHA-256 recorded with Exhibit 04.

That difference establishes that Exhibit 07 is not byte-for-byte identical to the certified Exhibit 05 reference document. It does not, by itself, establish falsification, authorship, knowledge or intent.

Exhibit 07 was not separately certified through Certidox and no corresponding document-certification record exists. Exhibit 12 does not stipulate that every Order Form created, modified or transmitted in connection with the transaction was required to be separately certified through Certidox.

The issue is therefore what evidentiary weight should be assigned to the material difference between Exhibits 05 and 07 and to the absence of a separate document-certification record for Exhibit 07, without treating either fact as standalone proof of falsity.

ISSUE 7 - SIGNIFICANCE OF SUBSEQUENT CONDUCT AND RELIANCE

The seventh issue concerns the evidentiary significance of the parties' conduct after the B+C+D position became explicit.

Southbridge transmitted Invoice ST-2026-0924-01 on the basis of Service A and Options B, C and D.

Laura Bennett subsequently sent a Certidox-certified response stating that ApexGrid had elected Option B only and that Options C and D had not been selected and remained unselected.

Sarah Mitchell then responded by relying upon and producing Exhibits 06 and 07 as Southbridge records supporting its position that ApexGrid had elected Options B, C and D.

The neutral may consider that sequence together with the certified reference records, the stipulated automatic certification rule, the negative record evidence concerning Exhibit 06, the September 24 user certification history reflected in Exhibit 21, the material differences between Exhibits 05 and 07, and the independent technical verification evidence.

Laura Bennett's later certified rejection of the B+C+D position does not, by itself, establish that Exhibits 06 or 07 are inauthentic.

Similarly, Sarah Mitchell's reliance upon and production of those records does not, by itself, establish that she personally created or altered them or knew that they were false or inauthentic.

The issue is what evidentiary significance those acts should receive when considered as part of the record as a whole.

ISSUE 8 - OVERALL WEIGHT OF THE COMPLETE RECORD

The ultimate evidentiary issue is whether the complete record supports or undermines the authenticity and evidentiary weight of Exhibits 06 and 07.

That assessment should not turn on any single exhibit or isolated technical fact.

The neutral may consider together:

- the contractual extension that made a later September 24 election possible;
- the certified reference records in Exhibits 04 and 05;
- the fact that those records predate the 12:44:43 p.m. message date borne by Exhibit 06;
- the stipulated automatic outbound-email certification rule;
- the absence of a corresponding Certidox certification record and QR code of its own for Exhibit 06;
- the September 24 user certification history reflected in Exhibit 21, together with the expressly stipulated limitations of that service-side system record;
- the material difference between Exhibit 07 and the certified Exhibit 05 reference document and the absence of a separate document-certification record for Exhibit 07, without treating either fact as standalone proof of falsity;
- the user-facing and independent technical verification evidence;
- the independently issued DigiStamp RFC 3161 timestamp evidence;
- the demonstrative relationships summarized in Exhibits 19 and 20, to the extent established or stipulated elsewhere in the record; and
- the parties' subsequent conduct and reliance.

Exhibits 19 and 20 may assist in organizing and comparing that evidence, but they do not create or stipulate additional facts and do not enlarge the evidentiary effect of the underlying exhibits.

Ultimate conclusions concerning authentication, integrity, provenance, personal authorship, knowledge, intent and evidentiary weight remain for the neutral to determine from the complete record.

III. APEXGRID'S POSITION

ApexGrid may argue as follows.

1. The September 24 extension made a later election possible, but does not establish that one occurred.

ApexGrid does not dispute that the parties validly extended the Election Period through 5:00 p.m. CDT on September 24, 2026.

That extension made an additional election contractually possible. It does not, however, establish that ApexGrid actually made any election beyond Option B.

The evidentiary question is therefore not whether Laura Bennett could have made a later election. She could have. The question is whether Exhibits 06 and 07 are authentic records showing that she actually did so.

ApexGrid may argue that this distinction is important because contractual possibility cannot substitute for evidence that the purported later communication and election actually occurred.

2. Exhibits 04 and 05 form mutually consistent certified reference records.

Exhibit 04 is Laura Bennett's Certidox-certified email stating that ApexGrid elects Option B and expressly stating that Options C and D remain unselected.

Exhibit 05 is the separately Certidox-certified Enterprise Services Order Form showing Service A and Option B selected, with Options C and D unselected.

The two records therefore reflect the same election in two different forms: the certified email communication and the certified Order Form.

Exhibit 12 stipulates that the SHA-256 of Exhibit 05 matches the PDF-attachment SHA-256 recorded in the certified email-content representation associated with Exhibit 04 and that, for purposes of the mock hearing, this matching SHA-256 establishes that Exhibit 05 is byte-for-byte identical to that attachment.

ApexGrid may argue that this combination creates a particularly strong contemporaneous reference point: the certified email states the election, the certified Order Form reflects the same election, and the attachment relationship is established through matching cryptographic hashes.

Both certified reference records also predate the 12:44:43 p.m. message date borne by Exhibit 06.

3. The stipulated automatic certification rule and Exhibit 21 give evidentiary significance to the absence of a record for Exhibit 06.

ApexGrid may argue that the absence of a Certidox certification record for Exhibit 06 cannot be evaluated in isolation.

Exhibit 12 stipulates that 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. The certification process required no separate action by Laura Bennett.

Exhibit 06 has neither a corresponding certification record nor a Certidox QR code of its own. The QR code visible within its quoted earlier thread resolves to the certification record associated with Exhibit 02.

Exhibit 21 adds a separate evidentiary layer. By stipulation, it 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 record for Exhibit 06.

ApexGrid may therefore argue that this is not merely an assertion that an uncertified email is false. It is the absence of the certification record and QR code that the stipulated automatic process would ordinarily generate, evaluated together with a stipulated user certification history containing no corresponding record.

ApexGrid need not contend that either absence, standing alone, conclusively establishes falsity. Exhibit 21 is a service-side system record rather than an independent cryptographic verification bundle, and ultimate evidentiary weight remains for the neutral.

4. The certified reference records can be independently reconstructed and timestamp-verified.

ApexGrid may emphasize that the certified reference records do not depend solely on screenshots, later testimony or the Certidox user interface.

Exhibits 16 and 18 provide separate, reproducible technical verification paths for the certified reference records.

Exhibit 16 permits independent reconstruction of the exact certified PDF associated with Exhibit 05.

Exhibit 18 permits independent reconstruction and verification of the certified email-content representation associated with Exhibit 04, including the protected attachment metadata recording the SHA-256 of the attached PDF.

Those technical exhibits permit verification of the relevant SHA-256 relationships, QR and reading-key linkage, manifest integrity and independently issued DigiStamp RFC 3161 timestamp evidence using independently available technical tools and DigiStamp trust material obtained independently of Certidox.

Except for current certification status, the reconstruction and timestamp-verification procedures do not require reliance on the Certidox live verification display. The email-bundle procedure described in Exhibit 18 also does not require access to the original mailbox or original mail server.

ApexGrid may argue that these characteristics materially strengthen the evidentiary value of the certified reference records because a reviewing party can independently reproduce important parts of the verification chain rather than merely accepting a Certidox-generated display.

5. Exhibits 06 and 07 materially differ from the certified reference records.

The disputed records do not concern an incidental or immaterial difference.

Exhibit 04 records an election of Option B with Options C and D expressly left unselected.

Exhibit 05 reflects the same A+B configuration in the Order Form.

Exhibit 06 purports to state that ApexGrid subsequently decided to add Options C and D and instructed Southbridge to proceed with Options B, C and D.

Exhibit 07 correspondingly shows Service A and Options B, C and D selected.

The SHA-256 of Exhibit 07 differs from the SHA-256 of Exhibit 05 and from the PDF-attachment SHA-256 recorded with Exhibit 04.

ApexGrid may argue that Exhibits 06 and 07 therefore reflect a materially different asserted state of the transaction from the certified reference records.

A different SHA-256 establishes difference rather than falsity. ApexGrid may nevertheless argue that the material content difference becomes significant when evaluated together with the certification-record evidence, the September 24 user certification history reflected in Exhibit 21, and the subsequent conduct of the parties.

6. Exhibit 07 does not have the same independently verifiable evidentiary foundation as Exhibit 05.

Exhibit 05 is separately Certidox-certified. Through Exhibit 16, its exact certified PDF can be independently reconstructed, and its SHA-256 matches the PDF-attachment SHA-256 recorded in the certified email-content representation associated with Exhibit 04. Exhibit 12 stipulates that this matching SHA-256 establishes byte-for-byte identity.

Exhibit 07 has a different SHA-256, was not separately certified through Certidox and has no corresponding document-certification record.

ApexGrid may argue that this gives Exhibit 07 a materially different evidentiary foundation from Exhibit 05. The argument does not require treating the differing SHA-256 or the absence of separate certification as standalone proof of falsity. Exhibit 12 expressly does not stipulate that every Order Form was required to be separately certified.

7. Southbridge subsequently relied upon and produced the disputed records after Laura's certified rejection of the B+C+D position.

The subsequent sequence provides additional context.

Southbridge transmitted Invoice ST-2026-0924-01 based on Service A and Options B, C and D.

Laura Bennett then sent a Certidox-certified response stating that ApexGrid had elected Option B only and that Options C and D had not been selected and remained unselected.

Sarah Mitchell subsequently responded by relying upon and producing Exhibits 06 and 07 as Southbridge records supporting its position that ApexGrid had elected Options B, C and D.

ApexGrid may argue that this sequence connects Southbridge's commercial position directly to the disputed records and shows that Exhibits 06 and 07 became the evidentiary basis offered by Southbridge when the conflict became explicit.

ApexGrid need not contend that Sarah Mitchell's reliance itself proves fabrication, personal authorship or knowledge of falsity.

It may instead argue that the reliance becomes significant when considered together with the certified reference records, the automatic certification rule, the absence of a corresponding certification record and QR code of its own for Exhibit 06, the September 24 user certification history reflected in Exhibit 21, and the material differences between Exhibits 05 and 07.

8. The complete record undermines the authenticity and evidentiary weight of Exhibits 06 and 07.

ApexGrid's position may therefore be summarized as follows.

A valid September 24 extension made a later election contractually possible, but the extension does not establish that such an election actually occurred.

The contemporaneous certified reference evidence records an A+B election with Options C and D unselected. Exhibit 05 is stipulated to be byte-for-byte identical to the PDF attachment whose SHA-256 was recorded with Exhibit 04. Those certified records can subsequently be examined through both user-facing verification and separate, reproducible technical procedures using independently available tools and independently issued DigiStamp RFC 3161 timestamp evidence.

Exhibit 06 purports to reflect a materially different later election. It has no corresponding Certidox certification record and no Certidox QR code of its own. Exhibit 21, which by stipulation accurately displays all Certidox document and email certification records associated with Laura Bennett's user account dated September 24, contains no corresponding record for Exhibit 06.

Exhibit 07 materially differs from the certified Order Form and does not have a separate Certidox document-certification record, although Exhibit 12 does not stipulate that every Order Form was required to be separately certified.

Southbridge subsequently relied upon and produced Exhibits 06 and 07 after Laura Bennett had expressly rejected the B+C+D position in a certified email.

ApexGrid may argue that these facts, considered together rather than in isolation, materially undermine the authenticity and evidentiary weight of Exhibits 06 and 07 as records of an additional election actually made by Laura Bennett.

That position does not require the neutral to treat the absence of certification as automatic proof of falsity, determine personal authorship, or infer fraudulent intent from any single fact.

IV. SOUTHBRIDGE'S POSITION

Southbridge should be permitted to advance the strongest reasonable position supported by the stipulated record.

1. The valid September 24 extension left open the contractual possibility of a later election through 5:00 p.m. CDT.

Southbridge may begin with a point that is not disputed.

The original Election Period had expired, but on September 24 Laura Bennett requested an extension through 5:00 p.m. CDT and Sarah Mitchell accepted that extension on behalf of Southbridge. Exhibit 12 stipulates the relevant authority, receipt and validity of that extension.

Accordingly, an additional election on September 24 was contractually possible.

Southbridge may argue that this matters because the certified A+B records documented ApexGrid's then-certified election position, but the parties had expressly left open a period during which ApexGrid could make an additional election.

The existence of the extension does not establish that a later election actually occurred. It does, however, mean that a later election cannot be rejected merely because it would differ from the earlier certified reference records.

2. The earlier certified reference records do not, by themselves, freeze the parties' later contractual choices.

Southbridge may accept that Exhibits 04 and 05 accurately reflect the certified reference position at the relevant times.

Exhibit 04 records an election of Option B and expressly states that Options C and D remain unselected. Exhibit 05 shows the corresponding A+B configuration in the Order Form.

Southbridge may nevertheless argue that certification of those records establishes what was certified at that time. It does not, by itself, establish that Laura Bennett could not subsequently change ApexGrid's election before the extended 5:00 p.m. CDT deadline.

In other words, a certified reference record can establish a reliable earlier evidentiary reference point without necessarily establishing that the parties' contractual position could not later change.

Southbridge may therefore contend that the certified reference records are highly relevant evidence, but they are not logically dispositive of whether a later election occurred.

3. The absence of a corresponding certification record is significant, but it is not itself a stipulated finding that Exhibit 06 is false.

Southbridge may accept the stipulated automatic outbound-email certification rule and the stipulated foundation for Exhibit 21.

Exhibit 12 stipulates that 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 has no corresponding certification record and no QR code of its own.

Southbridge must also accept that Exhibit 21 accurately displays all Certidox document and email certification records associated with Laura Bennett's user account dated September 24, 2026, and that no corresponding record for Exhibit 06 appears in that history.

Southbridge may nevertheless distinguish those stipulated facts from the ultimate inference to be drawn from them. Exhibit 12 expressly provides that the absence of a corresponding certification record for Exhibit 06, standing alone, does not establish that Exhibit 06 is false. Exhibit 21 is also expressly characterized as a Certidox service-side system record rather than an independent cryptographic verification bundle.

Southbridge's position therefore need not be that the absence is irrelevant or that the stipulated history is incomplete. It may instead argue that the neutral must determine what evidentiary weight those facts deserve when considered together with Exhibit 06 itself, Exhibit 07, the limits of the verification evidence and the remainder of the record.

4. Different SHA-256 values establish that Exhibits 05 and 07 are different files, not by themselves why they differ or which reflects the parties' final election.

It is undisputed that Exhibit 05 and Exhibit 07 have different SHA-256 values.

That cryptographically establishes that they are not byte-for-byte identical files.

Southbridge may argue, however, that a difference in hash does not itself explain why the two files differ, who caused the difference, when the relevant changes were made, or which file reflects the parties' final election.

The hash evidence therefore establishes an important technical fact: Exhibit 07 is materially different from the certified Exhibit 05.

It does not, standing alone, establish falsification, authorship, knowledge or intent.

Southbridge may accordingly argue that the hash difference must be evaluated together with the surrounding evidence rather than treated as an independent determination that Exhibit 07 is false.

5. The absence of a separate document-certification record for Exhibit 07 does not establish falsity.

Southbridge may draw an important distinction between the certification evidence concerning Exhibit 06 and the certification status of Exhibit 07.

Exhibit 12 establishes that 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.

It does not stipulate that every Order Form created, modified, attached or transmitted in the course of the parties' dealings would necessarily have generated a separate Certidox document-certification record.

The parties expressly do not stipulate that the absence of a separate document-certification record for Exhibit 07, standing alone, establishes that Exhibit 07 is false.

Southbridge may therefore argue that the absence of a separate Certidox document certification for Exhibit 07 cannot properly be treated as equivalent to the negative-record evidence concerning the purported 12:44:43 p.m. outbound email.

The authenticity and evidentiary weight of Exhibit 07 must instead be evaluated from its content, its relationship to Exhibit 06, the differing SHA-256 values, the absence of a separate document-certification record and the remainder of the evidentiary record.

6. Exhibit 21 must be given its stipulated scope, but not more.

Southbridge may not dispute that Exhibit 21 accurately displays all Certidox document and email certification records associated with Laura Bennett's user account dated September 24, 2026, or that no corresponding record for Exhibit 06 appears in that history.

Southbridge may, however, insist upon the limitations expressly stipulated for Exhibit 21. It is a Certidox service-side system record, not an independent cryptographic verification bundle. It does not, by itself, establish that Exhibit 06 is false, determine authorship of any disputed record, or establish fraud, intent or ultimate evidentiary weight.

Southbridge may therefore argue that Exhibit 21 is important adverse evidence without treating it as independently dispositive of authenticity.

7. Subsequent reliance upon Exhibits 06 and 07 does not itself establish knowledge or fraudulent intent.

Sarah Mitchell subsequently relied upon and produced Exhibits 06 and 07 as Southbridge records supporting the position that ApexGrid had elected Options B, C and D.

Southbridge may argue that reliance upon a record is not the same thing as creation of that record and does not, by itself, establish knowledge that the record is false or inauthentic.

Southbridge may therefore contend that Sarah Mitchell's later production of Exhibits 06 and 07 is relevant to the history of the dispute and establishes Southbridge's reliance on those records, but it does not independently establish personal fabrication, alteration, knowledge or fraudulent intent.

Those inferences, if any, must come from the complete evidentiary record rather than from subsequent reliance alone.

8. The technical verification exhibits must be confined to what they actually establish.

Southbridge may acknowledge that Exhibits 14, 16 and 18 provide substantial technical verification of the certified evidence used in the hearing.

Those exhibits permit independent reconstruction and verification of specified certified content, SHA-256 relationships, QR and reading-key linkage, manifest integrity and DigiStamp RFC 3161 timestamp evidence.

Southbridge may nevertheless insist that the technical verification exhibits be confined to their stated scope.

Exhibits 14 and 18 reconstruct certified email-content representations as document.json. They do not reconstruct the corresponding native .eml files byte-for-byte.

The email verification bundles also do not contain attachment files as separate attachment payloads. In Exhibit 18, the attachment relationship is established through protected attachment metadata and the matching SHA-256 stipulated in Exhibit 12.

Current Certidox certification status remains a separate live service-side value.

Most importantly, the technical bundles do not independently determine whether Exhibits 06 or 07 are authentic or false, who created or altered them, what Sarah Mitchell knew, or whether anyone acted with fraudulent intent.

Southbridge may therefore accept the technical verification evidence while arguing that the neutral must not extend its conclusions beyond what the underlying cryptographic and timestamp procedures actually establish.

9. The disputed records must ultimately be evaluated on the complete evidentiary record.

Southbridge's position may therefore be summarized as follows.

The Certidox evidence provides strong evidence concerning the certified content and its cryptographic integrity, together with the recorded Certidox certification-event information and independently issued DigiStamp timestamp evidence over the exact manifest hash.

The September 24 extension nevertheless made a later election contractually possible.

The absence of a corresponding certification record and QR code of its own for Exhibit 06 is significant evidence under the stipulated automatic outbound-email certification rule. Exhibit 21 further provides a stipulated September 24 user certification history containing no corresponding record for Exhibit 06. But Exhibit 12 expressly stops short of stipulating that this absence, standing alone, establishes falsity, and Exhibit 21 remains a service-side system record rather than an independent cryptographic verification bundle.

The different SHA-256 values establish that Exhibits 05 and 07 are different files, but do not independently explain the cause of that difference. The absence of a separate document-certification record for Exhibit 07 likewise does not, standing alone, establish falsity.

Sarah Mitchell's subsequent reliance upon and production of the disputed records establishes reliance, but does not by itself establish fabrication or knowledge of falsity.

Southbridge may therefore argue that the neutral should give full weight to the stipulated and independently verifiable Certidox evidence while still determining the authenticity and evidentiary weight of Exhibits 06 and 07 from the record as a whole rather than converting any single fact into a dispositive conclusion.

The ultimate questions of authentication, integrity, provenance, personal authorship, knowledge, intent and evidentiary weight remain for the neutral.

V. STIPULATED FACTS AND RECORD RELATIONSHIPS

To distinguish expressly stipulated facts from descriptive relationships among the exhibits, they are identified separately below.

A. PRINCIPAL EXPRESSLY STIPULATED FACTS

Among the facts expressly stipulated in Exhibit 12 are:

- the September 24 exchange reflected in Exhibits 02 and 03 validly extended the Election Period through 5:00 p.m. CDT, and Laura Bennett and Sarah Mitchell possessed the authority necessary to make and accept that extension;
- Southbridge received Exhibits 02 and 10;
- 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, without requiring separate action by Laura Bennett;
- the independent-verification bundles follow the architecture and limitations described in Exhibit 12;
- the matching SHA-256 establishes that Exhibit 05 is byte-for-byte identical to the PDF attachment whose SHA-256 was recorded in the certified email-content representation associated with Exhibit 04;
- Exhibit 06 bears a 12:44:43 p.m. CDT message date, has no corresponding Certidox certification record and no Certidox QR code of its own;
- the QR code visible within the quoted earlier thread in Exhibit 06 resolves to the certification record associated with Exhibit 02;
- the presence of the header fields and DKIM-Signature header in Exhibit 06 is stipulated, but their authenticity, provenance, cryptographic validity and evidentiary effect are not;
- Exhibit 07 has a SHA-256 different from Exhibit 05 and from the PDF-attachment SHA-256 recorded with Exhibit 04; Exhibit 07 was not separately certified through Certidox and no corresponding document-certification record exists;
- the parties do not stipulate that every Order Form was required to be separately certified through Certidox;
- Exhibit 21 accurately displays all Certidox document and email certification records associated with Laura Bennett's user account dated September 24, 2026; the underlying certification data are stored in encrypted form; access requires authentication; and Laura Bennett was the only authorized user of that account;
- Exhibit 21 displays records associated with Exhibits 02, 05, 04 and 10 and no corresponding certification record for Exhibit 06;
- Exhibit 21 is a Certidox service-side system record, not an independent cryptographic verification bundle; and
- the absence of a corresponding certification record for Exhibit 06 or a separate document-certification record for Exhibit 07, standing alone, does not establish falsity, and Exhibit 12 does not stipulate authorship, knowledge, fraudulent intent or ultimate evidentiary weight.

These stipulated facts define the evidentiary foundation of the hearing. They do not determine the ultimate inferences to be drawn from that foundation.

B. RECORD RELATIONSHIPS REFLECTED IN THE EXHIBIT SET

Separate from the stipulated foundational facts above, the exhibit set presents the following descriptive relationships:

- Exhibits 04 and 05 constitute the certified reference records concerning the Option B election;
- Exhibit 04 records an election of Option B with Options C and D unselected, and Exhibit 05 shows Service A and Option B selected with Options C and D unselected;
- Exhibits 04 and 05 predate the 12:44:43 p.m. message date borne by Exhibit 06;
- Exhibits 06 and 07 constitute the disputed B+C+D records;
- Exhibits 05 and 07 are materially different files and have different SHA-256 values;
- Exhibits 13, 15 and 17 provide user-facing Certidox verification results associated respectively with Exhibits 02, 05 and 04;
- Exhibits 14, 16 and 18 provide corresponding independent technical verification paths for Exhibits 02, 05 and 04, respectively;
- Exhibit 19 compares the certified reference Order Form, Exhibit 05, with the disputed Order Form, Exhibit 07;
- Exhibit 20 compares the certified reference email, Exhibit 04, with the disputed email, Exhibit 06;
- Exhibit 21 provides the stipulated September 24 user certification history associated with Laura Bennett's Certidox account; it is a service-side system record and not an independent cryptographic verification bundle; and
- Exhibits 19 and 20 are demonstrative comparison exhibits and do not create or stipulate additional facts or enlarge the evidentiary effect of the underlying record.

These relationships organize the evidentiary record. They do not themselves determine authenticity, provenance, personal authorship, knowledge, intent or ultimate evidentiary weight.

Recognition of the stipulated foundation and the structure of the record allows the hearing to focus on the actual dispute: what inferences should be drawn from those facts and what evidentiary weight should be assigned to Exhibits 06 and 07.

VI. MATTERS NOT PRESENTED FOR DETERMINATION

The mock hearing is limited to the evidentiary issues arising from the competing electronic records presented in this simulated dispute.

The mock hearing is not intended to determine:

- whether Certidox satisfies every possible legal authentication or admissibility requirement in every jurisdiction or factual setting;

- whether the absence of Certidox certification automatically renders a record inadmissible or false;
- whether Certidox, standing alone, proves fraud, fabrication or alteration;
- whether Sarah Mitchell, or any other person, committed a criminal offense or incurs separate civil liability for fraud, forgery or similar misconduct;
- whether Invoice ST-2026-0924-01 was ultimately contractually correct or payable, except insofar as the invoice and the parties' responses provide context for their reliance upon the competing records;
- the ultimate enforceability of provisions of the underlying commercial agreement beyond the stipulated contractual foundation concerning the September 24 extension; or
- the general commercial merits, market value or desirability of Certidox as a product.

The neutral may consider evidence bearing on personal authorship, alteration, knowledge and intent insofar as those matters are relevant to the authenticity, provenance and evidentiary weight of Exhibits 06 and 07.

Any such consideration is limited to the evidentiary questions presented in this mock hearing and does not constitute a separate determination of civil or criminal liability.

The hearing is instead directed to the evidentiary significance of the competing records and related evidence presented in this simulated dispute, including the certified reference records, the stipulated automatic outbound-email certification rule, the absence of a corresponding certification record and QR code of its own for Exhibit 06, the September 24 user certification history reflected in Exhibit 21 and its expressly stated limitations, the material differences between Exhibits 05 and 07, the independent technical verification evidence, and the parties' subsequent conduct.

VII. QUESTIONS FOR THE NEUTRAL

The neutral may consider the following questions in evaluating the record:

1. **What evidentiary weight should be given to the certified reference records, Exhibits 04 and 05?**
2. **What significance should be attached to the stipulated byte-for-byte linkage between Exhibit 05 and the PDF attachment whose SHA-256 was recorded with Exhibit 04?**
3. **What significance should be attached to the stipulated rule that 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?**
4. **What significance should be attached to the absence of a corresponding Certidox certification record and QR code of its own for Exhibit 06, when**

considered together with the September 24 user certification history reflected in Exhibit 21?

5. What additional evidentiary weight, if any, results from the independently reproducible technical verification and DigiStamp RFC 3161 timestamp evidence?
6. What significance should be attached to the material differences between Exhibits 05 and 07 and to the absence of a separate document-certification record for Exhibit 07, given that the parties do not stipulate that every Order Form was required to be separately certified?
7. What significance should be attached to Laura Bennett's later certified rejection of the B+C+D position and Sarah Mitchell's subsequent reliance upon and production of Exhibits 06 and 07?
8. Considering the record as a whole, what evidentiary weight should be assigned to Exhibits 06 and 07?

VIII. CENTRAL QUESTION FOR THE HEARING

The central question is not: **"Does Certidox prove fraud?"**

Nor is it: **"Does the absence of certification automatically make a disputed record false?"**

The question is: **When materially conflicting electronic records are presented, what evidentiary weight should be assigned to the disputed records when they are evaluated against contemporaneous certified reference records, the stipulated automatic outbound-email certification rule, the absence of a corresponding certification record and QR code of its own for the purported 12:44:43 p.m. message, the stipulated September 24 user certification history reflected in Exhibit 21, independently reproducible technical verification, the evidentiary differences and limitations associated with Exhibit 07, and the subsequent conduct and reliance of the parties?**

The parties may advocate different conclusions from that evidence.

No single fact, standing alone, determines the outcome.

For the historical evidence, the significance lies in the combination of contemporaneous certified reference records, the stipulated automatic outbound-email certification rule, the absence of a corresponding certification record and QR code of its own for Exhibit 06, the service-side user certification history reflected in Exhibit 21, and historical reconstruction and timestamp verification that can be reproduced without reliance on a Certidox-generated verification display.

Exhibit 21 provides a separate service-side system-record layer and should not be conflated with the independent cryptographic verification bundles.

The result is that the conflict need not be evaluated solely as one party's account against another; the competing records can be tested against fixed certified reference records, independently reproducible verification evidence and the stipulated user certification history.

Ultimate conclusions concerning authentication, integrity, provenance, personal authorship, knowledge, intent and evidentiary weight remain with the neutral.