

# EXHIBIT 1

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

SERPAPI, LLC,

Plaintiff,

v.

ZILVINAS KUCINSKAS and  
SEARCHAPI LLC,

Defendants.

**DECLARATION OF MATTHEW  
SCHROEDER IN SUPPORT OF  
SERPAPI, LLC'S COMPLAINT**

I, Matthew Schroeder, declare as follows:

1. I am a Director at Berkeley Research Group, LLC ("BRG"), where I have been employed since 2018. I have personal knowledge of the matters stated herein, and, if called as a witness, I could and would competently testify thereto. I submit this Declaration in support of SerpApi, LLC ("SerpApi").

2. My analysis in this matter is ongoing, and I reserve the right to supplement my opinions based on further review of the evidence, additional evidence that may be provided to me, and/or to rebut opinions offered by Defendants or any experts working therefore.

3. I previously served as a Director, Forensics and Collections at Lighthouse eDiscovery, based in Seattle, Washington. Prior to that I held the same job title at Discovia, another forensics and electronic discovery consulting firm based in San Francisco, California. Lighthouse acquired Discovia in May 2017. Prior to Discovia, I worked for StoneTurn Group, a firm that provides expert witness and consulting services. I hold a B.S. in Information Science from Northeastern University. I maintain the EnCE, MCFE, and CCE computer forensics certifications, as well as a variety of technical IT certifications. I have completed training courses offered by

Guidance Software, SANS, Blackbag, Magnet Forensics, EC-Council, and Cellebrite, all of which are recognized leaders in computer forensics and cyber investigations.

4. I have 17 years of experience performing forensic imaging and analysis of computer hard drives and other electronic storage media, advising clients regarding eDiscovery and forensics issues, and providing expert testimony. I have conducted hundreds of computer forensics investigations (often involving numerous computers, devices, and massive amounts of data in a single case). These investigations have been in the context of a wide range of legal matters, including employment, intellectual property, cyber breach, trade secrets, and securities regulation. I have provided reports and executed affidavits and declarations describing my computer forensic analysis, and I have given both deposition and courtroom testimony.

5. My CV is attached as Exhibit A.

6. I have been retained by Kirkland & Ellis, LLP on behalf of its client SerpApi to examine certain logs in relation to former contractor Zilvinas Kucinskas.

7. I have received and reviewed the following evidence:

- A full access log from SerpApi's MongoDB service,
- email exports I created from SerpApi's Google Vault platform,
- various documents created by SerpApi in its investigation of this issue, and
- logs and screenshots from SerpApi's Stripe instance.

8. I further understand that Mr. Kucinskas was a Lithuania-based contractor and that he left SerpApi on July 23, 2021. I am informed and believe that Mr. Kucinskas gave notice of his resignation on July 7, 2021.

**I. MR. KUCINSKAS EXPORTED DATA FROM STRIPE AND KEPT ACCESSING IT AFTER LEAVING SERPAPI**

9. SerpApi uses Stripe<sup>1</sup> for payment processing and customer relationship management. I have reviewed SerpApi's Stripe logging and confirm that those logs show that Mr. Kucinskas created an export of a customer report from the platform on July 12, 2021, just eleven days before he left SerpApi, and five days after he gave notice.

10. SerpApi confirmed for me that the default fields exported with a customer report include:

- a. ID,
- b. Description,
- c. Email,
- d. Name,
- e. Created (UTC),
- f. Card ID,
- g. Total Spend,
- h. Payment Count,
- i. Refunded Volume,
- j. Dispute Losses.

11. It is unclear from the logging which fields Mr. Kucinskas downloaded.<sup>2</sup>

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<sup>1</sup> See <https://stripe.com>.

<sup>2</sup> This is a complete list of fields available, as provided to me by SerpApi: ID, Description, Email, Name, Created (UTC), Delinquent, Card ID, Card Name, Card Address Line1, Card Address Line2, Card Address City, Card Address State, Card Address Country, Card Address

(continued...)

12. The Stripe logs that I reviewed show that Mr. Kucinskas logged into the platform after he left SerpApi, on August 2, 2021, November 9, 2021, and June 7, 2022.

**II. MR. KUCINSKAS ACCESSED SERPAPI'S MONGODB DATABASE MULTIPLE TIMES AFTER LEAVING SERPAPI**

13. SerpApi's MongoDB logs show that Mr. Kucinskas accessed its service multiple times after he left SerpApi. I understand that SerpApi's MongoDB environment serves as a central repository that enables its code; containing the data they use to answer queries and to store information about users, test data, statistics, and more.

14. I created and compared a list of IP addresses<sup>3</sup> previously used by Mr. Kucinskas to send emails and IP addresses that he used to log into Stripe. Specifically, Mr. Kucinskas used IP address 196.240.54.21 to access Stripe on June 7, 2022, with his own login credentials, and used IP address 78.61.206.75 to access Stripe on November 9, 2021, with his own login credentials.

15. I then queried the MongoDB log for these two IP addresses 196.240.54.21 and 78.61.206.75, and I found that he accessed the service 29 times following his termination from SerpApi:

- a. 2022-06-07, from IP 196.240.54.21
- b. 2022-07-03, from IP 78.61.206.75
- c. 2022-08-11, from IP 78.61.206.75
- d. 2022-08-14, from IP 78.61.206.75
- e. 2022-09-01, from IP 78.61.206.75

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Zip, Card AVS Line1 Status, Card AVS Zip Status, Card Brand, Card CVC Status, Card Exp Month, Card Exp Year, Card Fingerprint, Card Funding, Card Issue Country, Card Last4, Card Tokenization Method, Plan, Status, Cancel At Period End, Account Balance, Currency, Total Spend, Payment Count, Average Order, Refunded Volume, Dispute Losses, Business Vat ID, Tax Location Recognized.

<sup>3</sup> IP Addresses are groups of numbers like “1.2.3.4” and represent a particular virtual location on the internet. Typically, IP Addresses are assigned by an Internet Service Provider (ISP).

- f. 2022-09-05, from IP 78.61.206.75
- g. 2022-12-15, from IP 78.61.206.75
- h. 2023-01-06, from IP 78.61.206.75
- i. 2023-01-13, from IP 78.61.206.75
- j. 2023-01-17, from IP 78.61.206.75
- k. 2023-02-13, from IP 78.61.206.75
- l. 2023-02-19, from IP 78.61.206.75
- m. 2023-03-29, from IP 78.61.206.75
- n. 2023-04-19, from IP 78.61.206.75
- o. 2023-04-24, from IP 78.61.206.75
- p. 2023-04-26, from IP 78.61.206.75
- q. 2023-05-01, from IP 78.61.206.75
- r. 2023-05-04, from IP 78.61.206.75
- s. 2023-05-08, from IP 78.61.206.75
- t. 2023-05-09, from IP 78.61.206.75
- u. 2023-05-12, from IP 78.61.206.75
- v. 2023-05-30, from IP 78.61.206.75
- w. 2023-06-01, from IP 78.61.206.75
- x. 2023-06-19, from IP 78.61.206.75
- y. 2023-07-03, from IP 78.61.206.75
- z. 2023-07-19, from IP 78.61.206.75
- aa. 2023-08-28, from IP 78.61.206.75
- bb. 2023-08-30, from IP 78.61.206.75
- cc. 2023-09-08, from IP 78.61.206.75

16. The 196.240.54.21 IP address is assigned to ISP “Orion Network Limited / packetexchange.eu and is roughly geolocated to Riga, Latvia.”<sup>4</sup>

17. The 78.61.206.75 IP is based in Lithuania and assigned to Telia Lietuva, AB.<sup>5</sup>

18. Further, I found that three other IP addresses very likely to be Mr. Kucinskas’s also accessed MongoDB. While I did not specifically observe that he used these IPs in the Stripe logs or SerpApi emails available to me, they are issued by the same, Latvia-based ISP, “Orion Network Limited / packetexchange.eu,” are geolocated to the same area as Riga, Latvia, and are very close

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<sup>4</sup> I queried this extended information using ipinfo.io’s API. Results are available in Exhibit B.

<sup>5</sup> *Id.*

in number.<sup>6</sup> Typically, ISPs are assigned IP addresses for use in “blocks,” and numbers close to each other are likely to be used by the ISP in the same geographic region (and possibly within the same city or neighborhood). I also understand from SerpApi that Mr. Kucinskas is the only employee or contractor that has worked for them in the countries of Lithuania or Latvia, making it likely that these IPs are also him.

- a. 2023-02-20, from IP 196.240.54.53
- b. 2022-06-08, from IP 196.240.54.22
- c. 2022-07-10, from IP 196.240.54.44

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<sup>6</sup> *Id.*

I declare under penalty of perjury under the laws of the State of Texas that the foregoing is true and correct to the best of my knowledge. Executed in Shoreline, WA.

Dated: January 20, 2026

By: 

Matthew Schroeder

# EXHIBIT A

# Curriculum Vitae



**Matt Schroeder**  
**BERKELEY RESEARCH GROUP, LLC**  
 Seattle, WA  
[mschroeder@thinkbrg.com](mailto:mschroeder@thinkbrg.com)

## SUMMARY

Matt Schroeder is a Director in BRG's Discovery and Forensic Technology Services practice. Mr. Schroeder helps clients through complex investigations involving digital evidence, providing expert witness testimony in writing, deposition, and court. He focuses on issues surrounding trade secret theft, data destruction, incident response, and fraud. He operates out of BRG's Portland, OR office but is based in Seattle.

Mr. Schroeder advises clients on eDiscovery strategy and best practices, and can assist in vendor management and cost control. He excels at orchestrating large-scale investigations, managing teams of investigators and developing cost-effective and automated approaches to complex issues.

Mr. Schroeder is knowledgeable on emerging technology and industry challenges, such as:

- Collecting and analyzing data in enterprise cloud platforms, such as Office 365®, G Suite®, and Dropbox®
- Building programs to address insider data theft protection, data privacy, cybersecurity data breach response and awareness, and other information governance initiatives
- Forensic artifacts often overlooked or not well understood in the industry, particularly on Mac OS X® and Linux® systems
- Analysis and processing automation
- Programming languages, including Python, C#®, and SQL

Mr. Schroeder holds EnCE, CCE, and MCFE forensic certifications, as well as a variety of technical certifications. His selected case experience includes:

- Serving as an expert, he helped identify willful concealment of documents by custodians and efforts to evade eDiscovery data collection of relevant material, resulting in a large monetary award for his client.
- Investigating the computers of individuals who had left his client for the same competitor, he established that the custodians had taken confidential materials with them and destroyed significant evidence when caught.
- He has served frequently as a backstop to internal forensics groups inside large technology companies that have suffered data theft from departing employees. He has helped companies reclaim their data without requiring litigation.
- He organized a collection from five hundred user endpoints in the US and Europe while minimizing disruption to working professionals.

## EDUCATION

B.S., Information Science Northeastern University, 2009

## PRESENT EMPLOYMENT

Director, Berkeley Research Group, 2018-present

## PREVIOUS POSITIONS

Director, Lighthouse (formerly Discovia), 2012-2018  
Senior Consultant, StoneTurn, 2008-2012

## FORENSIC CERTIFICATIONS

EnCase Certified Examiner (EnCE), 2010  
Certified Computer Examiner (CCE), 2010  
Magnet Certified Forensics Examiner (MCFE), 2020

## OTHER CERTIFICATIONS

Texas Licensed Private Investigator # 152100001  
Who's Who Legal Thought Leader – Data Experts (2023, 2024, 2025)

## SELECTED FORENSICS TRAINING

Vound Software Intella Advanced Course, 2024  
Vound Software Intella Foundation Course, 2024  
Nuix Workstation – Data Discovery Core, 2021  
Nuix Workstation – Data Discovery Specialist, 2021  
Nuix Workstation – Data Discovery Administrator, 2021  
Magnet Forensics AX200 Magnet Axiom Examinations, 2020  
Magnet Forensics AX300 Advanced Mobile Forensics, 2020  
Magnet Forensics AX310 Axiom Incident Response Investigations, 2020  
Blackbag Tool Training, 2016  
Cellebrite Certified Physical Analyst, 2016  
SANS FOR508 Advanced Computer Forensic Analysis and Incident Response, 2012

## EXPERT TESTIMONY

*HALO MICROELECTRONICS CO., LTD., and HALO MICROELECTRONICS INT'L CORP. v. ELEVATION MICROSYSTEMS, INC., et al.*

Superior Court of the State of California, County of Santa Clara  
Case No. 25CV463582  
Provided a declaration in support of Halo's Motion for Preliminary Injunction on 6/20/2025.



*Motherboard Express Company, d/b/a MBX Systems v. Thomas Larson and Velasea, LLC*

United States District Court, Northern District of Illinois, Eastern Division

Case No. 1:23-cv-00475

Provided a declaration in support of Motion for Summary Judgement on 9/26/2023 and a declaration in support of Motion for Partial Summary Judgement on 12/21/2023.

*Empact Engineering LLC v. Matthew Waldron and Stonehollow Capital, LLC*

District Court of Brazos County, Texas

Cause No. 22-000899-CV-272

Provided an affidavit in support of Motion for Summary Judgement on 4/10/2023.

*Employee v. Employer*

Confidential arbitration case re alleged theft of trade secret material; AAA San Francisco.

Provided expert report on 3/22/2023; deposed 4/7/2023.

*BGC Inc., v. Kimberly Bryant*

United States District Court, Northern District of California

Case No. 3:22-CV-04801(JSC)

Provided a declaration in support of Emergency Motion to Enforce TRO on 3/31/2023. Provided a declaration in support of Renewed Motion for Temporary Restraining Order on 9/14/2022.

*TYR Tactical, LLC v. Josh Jones, et al.*

Superior Court of the State of Arizona in and for the County of Maricopa

Case No. CV2021-010387

Provided a declaration in support of Settlement Agreement on 11/4/2022.

*William J. Godfrey, as Administrator for the Estate of Cole Casey, Deceased, v. Mark C. Kirby and NSI Holdings, Inc.*

Superior Court of Dougherty County, State of Georgia

Case No. SUCV2020000586

Deposed on 4/27/2022; provided an affidavit on 4/29/2022 related to alleged spoliation.

*Landscape Workshop, LLC. v. Paul Matthew Harris*

Circuit Court of Lee County, Alabama

Case No. 43-cv-2022-900103.00

Provided an affidavit in support of Motion for Temporary Restraining Order. Signed 4/5/2022.

*Brad Peters, David Gray, and Paul Staelin v. Infor (US), LLC*

United States District Court, Northern District of California

Case No. 3:19-cv-08102-JCS

Provided a declaration in opposition to Motion for Partial Summary Judgment. Signed 11/12/2021.

*Dr. Albert Cha v. Vivo Capital, LLC and Vivo Ventures VII, LLC*

JAMS San Francisco

Ref. No. 1100110703

Provided expert report on 10/29/2021; deposed 12/7/2021.

*Coalition Inc., v. Alex Becker, John Loeber, Shea McNamara, Apollo Brokers, Inc.*

Superior Court of the State of California, County of San Francisco

Case No. CGC-20-584249

Provided a declaration in support of Motion for Preliminary Injunction. Signed 9/3/2020.

*Employee v. Employer*

Confidential arbitration case re employee termination; JAMS Seattle.

Provided testimony in trial on 1/10/2019.

*Patriot Environmental Services, Inc. v. Thomas Scranton et al.*

Superior Court of the State of California, County of Los Angeles

Case No. BC716929

Provided a declaration in support of opposition to TRO. Signed 8/12/2018.

*PeopleReady, Florida, Inc. v. Zandol Whited, Chartwell Staffing Solutions, et al.*

Circuit Court of the Fourth Judicial Circuit in and for Duval County, State of Florida

Case No. 16-2018-CA-000787-XXXX-MA

Provided an affidavit with findings in preparation for an evidentiary hearing. Signed 6/6/2018.

*Waymo, LLC v. Uber Technologies, Inc; OttoMotto LLC; Otto Trucking LLC*

United States District Court, Northern District of California

Case No. 3:17-cv-00939-WHA

Provided declaration in support of Motion for Jury Instruction Based on Spoliation. Signed 11/24/2017.

*Cobbs, Allen & Hall, Inc. and CAH Holdings, Inc. v. Epic Holdings et al.*

Circuit Court of Jefferson County, Alabama

Case No. 01-CV-2014-904935

Provided hearing testimony, deposition testimony, affidavits, and expert reports. Fifth and final report signed 11/18/2017.

*Alan Franklin v. Sunil Gupta, M.D., LLC, d/b/a Retina Specialty Institute*

Circuit Court of Mobile County, Alabama

Case No. CV-16-902495

Provided affidavit in support of Motion to Compel. Signed 5/12/2017.

*Hooked Media Group, Inc. v. Apple, Inc. and Chandrasekar Venkatarman*

Superior Court of the State of California, County of Santa Clara

Case No. 114CV265819

Provided a declaration, expert reports, and deposition testimony. Deposed on 10/25/2016.

*Lisa Lancaster and David Sundelson v. Rudy Leone et al.*



Superior Court of the State of California, County of Alameda

Case No. RG 13 693269

Provided a declaration in support of Motion to Compel.

*Larisa Piriyeva v. Sinai Memorial Chapel*

Superior Court of the State of California, County of San Francisco

Case No. CGC-11-515049

Provided a declaration in support of Motion for Summary Judgment. Signed 11/13/2012.

*Mehrdad Elie v. Michael A. Fedoris et al.*

Superior Court of the State of California, County of Los Angeles

Case No. GC046810

Provided a declaration in support of Motion for Termination and Monetary Sanctions. Signed March 2014.

*BWE II et al. v. Bryan Hall et al.*

Superior Court of the State of California, County of Marin

Case No. CV 1402561

Provided a declaration in Support of Motion for Expedited Discovery. Signed 8/2/2014.

# EXHIBIT B

ip	geo : city	geo : region	geo : code	geo : country	geo : code	geo : continent	geo : code	geo : latitude	geo : longitude	geo : timezone	geo : postal_code	geo : geoname_id	geo : radius	geo : last_changed	geo : dma_code	as : asn	as : name	as : domain	as : type	as : last_changed	anonymous : is_proxy	anonymous : is_relay	anonymous : is_tor	anonymous : is_vpn	anonymous : is_anonymous	is_anonymous : name	is_anonymous : is_ayncast	is_hosting	is_mobile	is_satellite	hostname
196.240.54.21	Riga	Riga	RX	Latvia	LV	Europe	EU	56.946	24.10589	Europe/Riga	LV-1001	456172	10	7/17/2022	AS41564	Orion Network Limited	packetexchange.eu	hosting	10/9/2025	FALSE	FALSE	FALSE	FALSE	FALSE	TRUE	FALSE	FALSE	FALSE	78-61-206-75.static.zebra.it		
196.240.54.22	Riga	Riga	RX	Latvia	LV	Europe	EU	56.946	24.10589	Europe/Riga	LV-1001	456172	10	7/17/2022	AS41564	Orion Network Limited	packetexchange.eu	hosting	10/9/2025	FALSE	FALSE	FALSE	FALSE	FALSE	TRUE	FALSE	FALSE	FALSE	78-61-206-75.static.zebra.it		
196.240.54.44	Riga	Riga	RX	Latvia	LV	Europe	EU	56.946	24.10589	Europe/Riga	LV-1001	456172	10	7/17/2022	AS41564	Orion Network Limited	packetexchange.eu	hosting	10/9/2025	FALSE	FALSE	FALSE	FALSE	FALSE	TRUE	FALSE	FALSE	FALSE	78-61-206-75.static.zebra.it		
196.240.54.53	Riga	Riga	RX	Latvia	LV	Europe	EU	56.946	24.10589	Europe/Riga	LV-1001	456172	10	7/17/2022	AS41564	Orion Network Limited	packetexchange.eu	hosting	10/9/2025	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	TRUE	FALSE	FALSE	78-61-206-75.static.zebra.it		
78.61.206.75	Klaipėda	Klaipėda County	KL	Lithuania	LT	Europe	EU	55.7068	21.13912	Europe/Vilnius	91001	598098	50	10/26/2025	AS8764	Telia Lietuva, AB	telia.lt	isp	5/1/2021	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	78-61-206-75.static.zebra.it		