

6. Near the commencement of this action, Gilead served copies of the Asset Freeze Order, Dkt. No. 18, on several U.S. banks. Gilead never served the Asset Freeze Order on any overseas banks because they are outside this Court's jurisdiction.

C. Defendants' Deficient Document Productions

7. Defendants have not produced any of the documents requested in Gilead's letter dated April 21, 2025, attached hereto as Exhibit 11, and have not produced a single pedigree.

8. Defendants have not produced any emails in this case, including no emails from the citypluscare@gmail.com account. I understand that because the citypluscare@gmail.com has two-factor authentication enabled, Gilead would be unable to access that email account, even with the current password.

9. On August 20, 2025, I received an email from the Individual Defendants' counsel, attached hereto as Exhibit 7. In a subsequent meet-and-confer call, I explained that the two bank accounts disclosed in that email were for two different Pakistani banks than the two Pakistani banks that Qaisar Chaudhary had previously disclosed at his deposition. From defense counsel's reaction to my statement, I was left with no doubt that they were learning that fact for the first time.

D. Attached Exhibits

10. Attached hereto are true and correct copies of the following documents:

Exhibit	Description
1	Treasury registry receipts from the Clerk of Court
2	Correspondence from Trenk Isabel, dated April 16, 2025
3	Correspondence in response to subpoena from Citibank, N.A., dated March 21, 2025
4	Wire transfer records produced by TD Bank in response to subpoena
5	Excerpt of wire transfer records produced by Standard Chartered Bank in response to subpoena
6	Transcript of deposition of Qaiser Chaudhary, dated May 15, 2025
7	Correspondence from J. Rubin, dated August 20, 2025
8	Individual Defendants' supplemental response to Plaintiffs' First Set of Document Requests, dated November 7, 2025
9	Supplemental production from Individual Defendants, dated November 12, 2025
10	Email correspondence with Trenk Isabel, dated March 26-28, 2025
11	April 21, 2025 correspondence to Defendants
12	Qaiser Chaudhary's Responses to Plaintiffs' First Set of Document Requests
13	Hamza Chaudhary's Responses to Plaintiffs' First Set of Document Requests
14	Nabila Chaudhary's Responses to Plaintiffs' First Set of Document Requests
15	Qaiser Chaudhary's Responses to Plaintiffs' First Set of Interrogatories
16	Hamza Chaudhary's Responses to Plaintiffs' First Set of Interrogatories
17	Nabila Chaudhary's Responses to Plaintiffs' First Set of Interrogatories
18	Hamza Chaudhary's Amended Responses to Plaintiff's First Set of Interrogatories
19	Hamza Chaudhary's Amended Responses to Plaintiffs' First Set of Document Requests
20	Transcript of deposition of Hamza Chaudhary, dated May 16, 2025
21	Screenshot from Hamza Chaudhary's phone, dated July 11, 2024

22	Texts from Hamza Chaudhary's phone, dated October 24, 2023
23	Correspondence from J. Rubin, dated August 21, 2025
24	Transcript of deposition of Shumaila Arslan, dated August 19, 2025
25	Declaration of Patrick Tobia, dated April 22, 2025
26	Texts from Hamza Chaudhary's phone, dated November 15, 2023, marked as deposition Exhibit 20 at the deposition of Hamza Chaudhary
27	Texts from Hamza Chaudhary's phone, dated January 10, 2023, marked as deposition Exhibit 14 at the deposition of Hamza Chaudhary
28	Texts from Hamza Chaudhary's phone, dated December 14, 2022, marked as deposition Exhibit 15 at the deposition of Hamza Chaudhary
29	Excerpted bank records produced by TD Bank in response to subpoena showing Qaiser Chaudhary's deposits, marked as Exhibit 4 at the deposition of Qaiser Chaudhary
30	Texts produced by Martin Jacob, dated April 17 through May 16, 2025
31	Texts from Hamza Chaudhary's phone, dated September 17, 2020
32	Texts from Hamza Chaudhary's phone, dated July 13, 2023, marked as deposition Exhibit 4 at the deposition of Hamza Chaudhary
33	Certificate found at Heal the World Pharmacy, marked as deposition Exhibit 17 at the deposition of Hamza Chaudhary
34	Excerpted bank records produced by TD Bank in response to subpoena showing Hamza Chaudhary's deposits, marked as deposition Exhibit 25 at the deposition of Hamza Chaudhary
35	Excerpted bank records produced by TD Bank in response to subpoena showing Qaiser Chaudhary's deposits, marked as deposition Exhibit 1 at the deposition of Qaiser Chaudhary
36	Response to subpoena from Charles Schwab, dated March 27, 2025
37	Transcript of hearing in this action held on April 18, 2025
38	Transcript of hearing in this action held on May 9, 2025
39	Transcript of hearing in this action held on May 21, 2025

40	Transcript of hearing in this action held on September 25, 2025
41	Excerpted bank records produced by TD Bank in response to subpoena showing Qaiser Chaudhary's deposits, marked as deposition Exhibit 4 at the deposition of Qaiser Chaudhary

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on November 21, 2025


TIMOTHY A. WATERS