

**JD WOODS LAW PLC**

220 Stonewell Drive, St. Johns, Florida 32259

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**DECLARATION OF JONATHAN D. WOODS, ESQ.**  
REGARDING AI DOCUMENT PROCESSING PRACTICES

I, Jonathan D. Woods, a member of The Florida Bar (No. 0145017) and principal of JD Woods Law PLC, declare under penalty of perjury:

- 1. QUALIFICATIONS.** I am a licensed attorney with over 30 years of experience in business transactions, technology, and legal operations. I have designed and implemented a private AI document processing system for litigation support services.
- 2. SYSTEM ARCHITECTURE.** JD Woods Law PLC operates a dedicated AI document processing system with the following specifications:
  - (a) Hardware: Bizon X5500 G2 workstation with dual NVIDIA RTX 5090 graphics processing units (64GB total video memory), AMD Threadripper Pro 9975WX processor, 128GB DDR5 ECC memory, and 2TB NVMe storage, located on the firm's premises in St. Johns, Florida.
  - (b) Software: Open-source large language model (Llama 3.3 70B) running locally via vLLM inference engine on Ubuntu 24.04 LTS. No proprietary AI service, cloud platform, or third-party API is used for document processing.
  - (c) Network Isolation: The AI inference engine operates without outbound internet connectivity. Documents submitted for processing cannot be transmitted to any external server, cloud platform, or AI provider by design.
- 3. DATA HANDLING.** For each engagement:
  - (a) Documents are received via encrypted transfer (physical media with full-disk encryption or dedicated SFTP with TLS 1.3).
  - (b) All processing occurs exclusively on the hardware described in paragraph 2(a). No document or derivative data is transmitted to any third party at any point during processing.
  - (c) No AI model is trained, fine-tuned, or modified using any submitted document. The model processes documents for the specific task requested and retains no persistent memory of document content between sessions.

(d) Upon completion of the engagement (or at the subscribing firm's direction), all documents and derivative data are permanently destroyed using the Department of Defense 5220.22-M three-pass overwrite protocol. A destruction certificate is issued for each engagement.

4. COMPLIANCE WITH PROTECTIVE ORDER REQUIREMENTS. This system satisfies the requirements established in Morgan v. V2X, Inc., No. 25-1991 (D. Colo. Mar. 30, 2026), specifically:

- (a) Prohibition on model training: No submitted data is used to train or improve any AI model. (Morgan requirement (1).)
- (b) Prohibition on third-party disclosure: No submitted data is disclosed to any third party. The data never leaves the firm's physical hardware. (Morgan requirement (2).)
- (c) Right to delete: All data is subject to secure destruction at the subscribing firm's direction, with verifiable destruction certification. (Morgan requirement (3).)

This system further satisfies the restrictions in Jeffries v. Harcos Chemicals, Inc., No. 25-2569-KHV-ADM (D. Kan. 2026), as it is a "closed" and "secure" AI system, not an "open" or publicly accessible platform. Data incorporated into processing is not retained in any model and is fully recoverable and deletable, unlike consumer AI systems where clawback is "impossible as a practical matter."

I declare under penalty of perjury that the foregoing is true and correct.

Executed on \_\_\_\_\_, in St. Johns, Florida.

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**Jonathan D. Woods, Esq.**

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