

The Honorable Barbara J. Rothstein

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PARLER LLC,

Plaintiff,

v.

AMAZON WEB SERVICES, INC.,

Defendant.

No. 2:21-cv-00031-BJR

**DECLARATION OF [REDACTED]  
[REDACTED] (AMAZON  
EXECUTIVE 1) IN  
OPPOSITION TO PARLER’S  
MOTION FOR TEMPORARY  
RESTRAINING ORDER**

The undersigned declares as follows:

1. I am [REDACTED] at Amazon Web Services, Inc. (“AWS”). I am over the age of 18 years and have personal knowledge of the matters stated in this Declaration. If called as a witness, I would testify competently to them.

2. I have been employed by AWS for more than 10 years. [REDACTED]  
[REDACTED]  
[REDACTED] As a result, I have personal involvement in and knowledge of our relationships with many of our customers, including Parler and Twitter.

3. AWS provides cloud hosting and computing services for businesses, non-profits, and government organizations around the world. Contrary to the assertion in Parler’s motion for temporary restraining order, there is no “global market” for “cloud service providers.” See Compl. ¶ 11. In reality, demand for web services includes intense competition between cloud

1 providers, on-premises hardware providers, co-location data center providers, managed service  
2 providers, and hybrid cloud providers.

3 4. AWS is content neutral – so long as they are engaged in lawful activities, we  
4 provide services to customers with all perspectives and points of view, political and otherwise.  
5 My role is to ensure that all of our customers succeed by helping them to use our services  
6 effectively across the broadest number of applicable needs. Our customer contracts require that  
7 our customers comply with the terms of our agreements with them, including Amazon’s  
8 Acceptable Use Policy.

9 5. Twitter’s principal social-media service (the “Twitter Feed”) does not run on  
10 AWS. Twitter does use AWS for some of their ancillary services, like data backup and  
11 analytics, and for its “Fleets” service, which allows users to share momentary thoughts, which  
12 disappear after 24 hours. Twitter’s subsidiary company, Periscope TV, is run using AWS  
13 resources.

14 6. On December 15, 2020, AWS announced that it signed an agreement with Twitter  
15 for AWS to begin servicing the Twitter Feed for the first time. Attached as **Exhibit A** is a true  
16 and correct copy of this announcement, which also is available at  
17 [https://press.aboutamazon.com/news-releases/news-release-details/twitter-selects-aws-strategic-](https://press.aboutamazon.com/news-releases/news-release-details/twitter-selects-aws-strategic-provider-serve-timelines)  
18 [provider-serve-timelines](https://press.aboutamazon.com/news-releases/news-release-details/twitter-selects-aws-strategic-provider-serve-timelines). I was personally involved in the negotiation and announcement of this  
19 agreement. We do not yet service the Twitter Feed, and I am not aware of any particular  
20 timeline for doing so.

21 7. Because the Twitter Feed does not run on AWS, the Twitter Feed (and any tweets  
22 on the Twitter Feed) are not subject to, and thus cannot violate, Amazon’s Acceptable Use  
23 Policy.

24 8. To my knowledge, AWS and Twitter have never discussed, much less agreed  
25 upon, any policy, practice, or act directed at Parler. To the contrary, we have an internal policy  
26 never to discuss matters involving one customer with another customer. Nobody in my  
27 organization would be authorized to discuss Parler with Twitter without my authorization,

1 knowledge, or involvement. I have not authorized any AWS employee to discuss Parler with  
2 Twitter, and I have not been involved personally in any such discussion.

3 9. The last time I spoke with anyone at Twitter was around December 11 and we  
4 exclusively discussed matters involving the December 15 press announcement. We did not  
5 discuss Parler.

6 10. After the notice of Parler's account suspension, Parler users began posting threats  
7 of physical violence to Amazon delivery drivers, Amazon facilities, and Amazon executives.  
8 True and correct copies of examples of these threats are attached as Exhibit F to the Declaration  
9 of Amazon Executive 2 in Opposition to Parler's Motion for Temporary Restraining Order. True  
10 and correct copies of additional examples are attached as Exhibit E to the Declaration of Amazon  
11 Executive 2 in Opposition to Parler's Motion for Temporary Restraining Order (see pages 12, 15,  
12 30, 43, 57, and 66). As a result of these threats and similar threats against employees of other  
13 companies that have suspended Parler or others from their services, I am concerned for my  
14 safety, as well as the safety of my colleagues.

15  
16 I declare under penalty of perjury that the foregoing is true and correct.

17 Executed on January 12, 2021 at Seattle, WA.



# **EXHIBIT A**

# Press release

## Twitter Selects AWS as Strategic Provider to Serve Timelines

December 15, 2020 at 9:00 AM EST

*Twitter will use AWS's industry-leading services and global infrastructure to power the real-time, global traffic and improve the experience for people who use Twitter*

SEATTLE--(BUSINESS WIRE)--Dec. 15, 2020-- Today, Amazon Web Services, Inc. (AWS), an Amazon.com, Inc. company (NASDAQ: AMZN), announced that Twitter (NYSE: TWTR) has selected AWS to provide global cloud infrastructure to deliver Twitter timelines. Under the multi-year deal, Twitter will leverage AWS's proven infrastructure and portfolio of services to support delivery of millions of daily Tweets. This expansion onto AWS marks the first time that Twitter is leveraging the public cloud to scale their real-time service. Twitter will rely on the breadth and depth of AWS, including capabilities in compute, containers, storage, and security, to reliably deliver the real-time service with the lowest latency, while continuing to develop and deploy new features to improve how people use Twitter. The new agreement builds on the companies' more than decade-long collaboration, where AWS continues to provide Twitter with storage, compute, database, and content delivery services to support its distribution of images, videos and ad content.

Millions of people and organizations use Twitter to share and react to what's happening and what people are talking about right now, and Twitter will leverage AWS infrastructure and services to continue improving performance and security for them. Twitter and AWS will create an architecture that extends Twitter's on-premises infrastructure to enable them to seamlessly run and scale the real-time service globally, increase its reliability using AWS's fault-tolerant infrastructure, and rapidly move new features into production around the world. Twitter will take advantage of AWS Graviton2-based instances on Amazon Elastic Compute Cloud (Amazon EC2) to power its cloud-based workloads, and use AWS container services to develop and deploy new features and applications consistently across its hybrid infrastructure.

In addition, Twitter will continue to use AWS services such as Amazon CloudFront (AWS's fast content delivery network service that securely delivers data, videos, applications, and APIs with low latency and high transfer speeds to customers globally) and Amazon DynamoDB (AWS's key-value database that delivers single-digit millisecond performance at any scale).

"We are excited to work with AWS to expand the infrastructure Twitter uses to serve the public conversation as we grow globally," said Parag Agrawal, Chief Technology Officer, Twitter. "The collaboration with AWS will improve performance for people who use Twitter by enabling us to serve Tweets from data centers closer to our customers at the same time as we leverage the Arm-based architecture of AWS Graviton2 instances. In addition to helping us scale our infrastructure, this work with AWS enables us to ship features faster as we apply AWS's diverse and growing portfolio of services."

"Twitter's decision to rely on AWS infrastructure and services for its real-time workloads will help them instantly scale their global footprint up and down without ever compromising the experience for people who use Twitter," said Matt Garman, Vice President, Sales and Marketing at Amazon Web Services, Inc. "By using AWS container services to create a seamless hybrid on-premises and cloud environment, Twitter can innovate and deliver new experiences quickly and cost-effectively."

## About Amazon Web Services

For 14 years, Amazon Web Services has been the world's most comprehensive and broadly adopted cloud platform. AWS offers over 175 fully featured services for compute, storage, databases, networking, analytics, robotics, machine learning and artificial intelligence (AI), Internet of Things (IoT), mobile, security, hybrid, virtual and augmented reality (VR and AR), media, and application development, deployment, and management from 77 Availability Zones (AZs) within 24 geographic regions, with announced plans for 18 more Availability Zones and six more AWS Regions in Australia, India, Indonesia, Japan, Spain, and Switzerland. Millions of customers—including the fastest-growing startups, largest enterprises, and leading government agencies—trust AWS to power their infrastructure, become more agile, and lower costs. To learn more about AWS, visit [aws.amazon.com](https://aws.amazon.com) (<https://cts.businesswire.com/ct/CT?id=smartlink&url=https%3A%2F%2Faws.amazon.com%2F&esheet=52348362&newsitemid=20201215005162&lan=en-US&anchor=aws.amazon.com&index=1&md5=a51a3ba246058b046f8880a9d93a66a3>).

## About Amazon

Amazon is guided by four principles: customer obsession rather than competitor focus, passion for invention, commitment to operational excellence, and long-term thinking. Customer reviews, 1-Click shopping, personalized recommendations, Prime, Fulfillment by Amazon, AWS, Kindle Direct Publishing, Kindle, Fire tablets, Fire TV, Amazon Echo, and Alexa are some of the products and services pioneered by Amazon. For more information, visit [www.amazon.com/about](http://www.amazon.com/about) (<https://cts.businesswire.com/ct/CT?id=smartlink&url=http%3A%2F%2Fwww.amazon.com%2Fabout&esheet=52348362&newsitemid=20201215005162&lan=en-US&anchor=www.amazon.com%2Fabout&index=2&md5=07422434feaaa64d09e68e6d21be008f>) and follow [@AmazonNews](https://cts.businesswire.com/ct/CT?id=smartlink&url=https%3A%2F%2Ftwitter.com%2FAmazonNews&esheet=52348362&newsitemid=20201215005162&lan=en-US&anchor=%40AmazonNews&index=3&md5=c99a4a52b1abdb57429cc836e41eab19) (<https://cts.businesswire.com/ct/CT?id=smartlink&url=https%3A%2F%2Ftwitter.com%2FAmazonNews&esheet=52348362&newsitemid=20201215005162&lan=en-US&anchor=%40AmazonNews&index=3&md5=c99a4a52b1abdb57429cc836e41eab19>).

## About Twitter, Inc.

Twitter is what's happening and what people are talking about right now. To learn more, visit [about.twitter.com](https://about.twitter.com) (<https://cts.businesswire.com/ct/CT?id=smartlink&url=http%3A%2F%2Fabout.twitter.com%2F&esheet=52348362&newsitemid=20201215005162&lan=en-US&anchor=about.twitter.com&index=4&md5=2e02b98e696c559fcd506f2732c352a9>) and follow [@Twitter](#). Let's talk.

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Source: Amazon Web Services, Inc.

