UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

JAMES CARTER

Plaintiff(s)

METROPOLITAN TRANSIT AUTHORITY

Defendant(s)

VERSUS

Case No. 2026-CV-01847

Section: E

Judge Chen

CERTIFICATION OF ELECTRONIC EVIDENCE
PURSUANT TO FEDERAL RULE OF EVIDENCE 902(13)

1. Declarant Identification

Name:	Sarah Mitchell, Esq.
Title:	Senior Partner
Qualifications:	Custodian of records for the Attested evidence management system used by Mitchell & Associates in connection with the above-captioned matter. I am familiar with the system's methods of capturing, storing, and securing electronically stored information and have personal knowledge of the facts set forth herein.
Firm/Organization:	Mitchell & Associates
Bar Number:	LA-31742 (Louisiana)

2. Foundation Statement

I, Sarah Mitchell, Esq., am Senior Partner at Mitchell & Associates. I am a custodian of records and/or a qualified person familiar with the record-keeping system used to store and manage the electronic evidence identified in this certification. I have personal knowledge of the matters stated herein and am competent to testify to the same.

3. System Description

Attested is an electronic evidence management system operated by Verifore Technologies LLC. The system processes uploaded files as follows:

1. Computes a SHA-256 cryptographic hash of the file at time of upload
2. Stores the hash and file metadata in a PostgreSQL database
3. Stores the file in AES-256 encrypted cloud storage with TLS 1.2+ transit encryption
4. Records every access event (viewer identity, timestamp, IP address, action) in an immutable log
5. Displays viewer identity as a visible overlay during playback via viewer attribution watermarking

This process executes automatically without manual intervention.

4. Accuracy Statement

The electronic process described above produces accurate results. SHA-256 is a cryptographic hash function standardized by the National Institute of Standards and Technology (NIST FIPS 180-4). The probability of two distinct files producing an identical SHA-256 hash is approximately 1 in 2^256, rendering accidental collision computationally infeasible.

The system stores the hash value computed at upload and compares it against the current file to verify integrity. A matching hash confirms the file has not been altered since upload. All timestamps are recorded in UTC synchronized via NTP. Access logs are append-only and cannot be modified after creation.

Recorded Hash: `7f83b1657ff1fc53b92dc18148a1d65dfc2d4b1fa3d677284addd200126d9069`

5. Evidence Identification

File Name:	intersection-photo-01.jpg
Bates Number:	**CARTER-0002**
SHA-256 Hash:	`7f83b1657ff1fc53b92dc18148a1d65dfc2d4b1fa3d677284addd200126d9069`
Upload Timestamp:	2026-02-28 10:14:00 UTC
Uploaded By:	s.mitchell@mitchell-associates.com
File Size:	4.6 MB
File Type:	image/jpeg

6. Foundation Questions for Photographic Evidence

The following questions establish the type-specific authentication foundation under the Federal Rules of Evidence:

Authority: FRE 901(b)(1) — Testimony of witness with knowledge

Q: "Can you identify what is depicted in this photograph?"

Describe the subject matter, scene, or individuals shown.

Q: "Do you recognize the scene or location shown?"

Identify the location and your basis for recognizing it.

Q: "Does this photograph fairly and accurately depict the scene as it appeared on [date]?"

Confirm the photograph is a true and accurate representation of the scene at the relevant time.

Q: "Was this photograph altered or edited after it was taken?"

Hash values match — no modification detected. See hash verification section above.

7. Chain of Custody Log

Date/Time (UTC)	Viewer	IP Address	Device	Action
2026-03-03 09:22 UTC	r.harrison@mta-legal.com	198.51.100.42	Chrome 121/Win	Viewed
2026-03-05 14:08 UTC	dr.patel@biomech-experts.com	203.0.113.88	Safari 17/Mac	Viewed
2026-03-07 11:45 UTC	paralegal@mitchell-associates.com	10.0.1.50	Firefox 122/Win	Viewed
2026-03-10 16:30 UTC	clerk@edla.uscourts.gov	149.101.1.14	Chrome 122/Win	Viewed

8. Integrity Statement

The hash value computed at the time of upload matches the current hash value, confirming the file has not been altered, modified, or tampered with since its original upload to the Attested evidence management system.

9. Notice Provision

This certification is provided pursuant to Fed. R. Evid. 902(13). Written notice has been provided to all parties in advance of trial as required by the rule.

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 14, 2026.

Signature: */s/ Sarah Mitchell, Esq.*

Printed Name: Sarah Mitchell, Esq.

Title: Senior Partner, Mitchell & Associates

Bar No.: LA-31742

Date: March 14, 2026