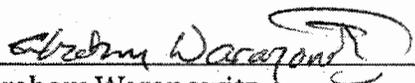
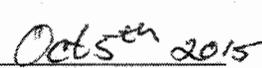


ABE WARANOWITZ AFFIDAVIT

I, Abraham Waranowitz, hereby affirm that the following is true and accurate to the best of my recollection:

1. I was a Radio Frequency (RF) Engineer, and I formerly worked for AT&T Wireless in the Baltimore-Washington area. I began working as an RF Engineer at AT&T Wireless in 1995 in Paramus NJ.
2. I was the State's expert witness with regard to cell tower technology in *State v. Adnan Syed*, Case Nos. 199103042-46. I was called as a State's witness and I testified on 2/8/00 and 2/9/00.
3. Just prior to my testimony, in the courthouse, Urick presented me with a document – which I was viewing for the first time – referred to as State's Exhibit 31. I remember reviewing one page of the document. Since this appeared to have ordinary AT&T cell site data on it, I accepted it as it was presented.
4. As an RF Engineer, I did not work with billing records (or subscriber activity reports) and had never seen AT&T Wireless billing or legal documents before I was presented with this document. RF Engineers worked with raw data from the switch. Billing records were separated from engineering activity for security and privacy.
5. What Urick did not tell me, or call my attention to, in relation to Exhibit 31, was that AT&T had previously issued the disclaimer that “Outgoing calls only are reliable for location status. Any incoming calls will NOT be considered reliable information for location.”
6. If I had known that it was AT&T Wireless' legal policy for incoming calls to not be considered reliable information in determining cell phone location, I would have inquired further within my organization and attempted to learn why this disclaimer was issued.
7. If I had been made aware of this disclaimer, it would have affected my testimony. I would not have affirmed the interpretation of a phone's possible geographical location until I could ascertain the reasons and details for the disclaimer.
8. I consider the existence of the disclaimer about incoming calls to have been critical information for me to address. I do not know why this information was not pointed out to me.
9. I first conveyed the information above to Justin Brown and his cell tower expert, Jerry Grant, in a telephone call on September 29, 2015.


Abraham Waranowitz


Date