

ACH/THR/0631

25 September 2025

Mr. Scott Harrell, CEO
Infoblox, Inc.
2390 Mission College Blvd
Suite 501
Santa Clara, CA 95054
USA

VIA email reportthreat@infoblox.com and by Federal Express

Dear Mr. Harrell,

RE: Publication by Infoblox of defamatory allegations regarding PropellerAds and AdTech Holding

Please be advised that this firm represents PropellerAds and AdTech Holding. Please direct all future communications with respect to my clients to my attention.

Reference is made to the article authored by Infoblox, Inc. and published on its website entitled "*Deniability by Design: DNS-Driven Insights into a Malicious Ad Network*", dated 16 September 2025, published on your website (the "Defamatory Article").

The Defamatory Article contains numerous inaccurate, unfounded, and outright false allegations about our clients and their business. These allegations were either fabricated or derived from unverified sources and were intentionally authored and published with the sole intent of disparaging our clients' reputation and creating unfounded fear, uncertainty and doubt in our clients' organization, products and services.

Even though our clients have always remained open to engagement, Infoblox and the authors of the Defamatory Article made no effort to contact them for clarification, comment, or rebuttal prior to publication – ostensibly because Infoblox wanted to omit from the Defamatory Article critical information regarding our clients' robust compliance framework and established anti-abuse mechanisms. Indeed, if Infoblox actually believed its own rhetoric, it would have abstained from making public statements designed to bring alleged network vulnerability to the attention of potential abusers.



Registration no: HE 242111

VAT no: CY 10242111Q

Lawyers: Michael McBride, Demetris Araouzos, Pavlina Constantinides, Marion Coukidou-Madella, Yiannis Christodoulou, Michalis Moushouttas, Amanda Cacoyanni, Katia Kakoulli, Andreas Charalambous, Demosthenes Mavrellis, Thomas Christodoulou, Chrysses S. Demetriades, Michaela Hadjihambi, Polyvios Panayides, Constantinos Mavrellis, Nicolas Georgiades, Giannis Agapiou, George McBride, Nikoleta Kleovoulou, Charis Agapiou, Rodoula Malikkidou, Cynthia McBride, Anthia Nutt, Marios Charalambous, Spyroula Iasonos, Skevi Roussou, Maria Socratous, Lanika Angelidou, Tonia Gregoriou, Andreas Lelekis, Savvas Loizides, Costas Georgiades, Evi Vasileiadi, Marilena Christoforou, Sophia Nearchou, Christos Herakleous, Vicky Gregoriou, Elena Papatoma, Maria Pitta, Styliana Mattheou, Irena Madella, Cleo Loizidou, Christina Lougkridou, Iphegenia Fisentzou, Ioanna Kyriakidou, Nicole Prodromou, Constantina Neocleous, Louiza Demosthenous, Petros Papadopoulos, Nefeli Kimonos, Konstantinos Araouzos, Christos Chiotis.

Consultants: Christos Mavrellis, George Christodoulou, Eliana Constantinides, Chris Georgiades.

Moreover, the highly unprofessional Defamatory Article contains multiple glaring errors, relies on the authors' subjective assessments, as well as unchecked sources and outdated and inaccurate research.

Incredibly, in the Defamatory Article Infoblox disseminates and tries to give life to a term of its own invention - "Vane Viper". The Defamatory Article is intentionally drafted so that the reader is left the false impression that the article reports on some sort of a long established recognized evil conspiracy. Nothing can be further from the truth, and the wording of the Defamatory Article suggests that Infoblox knows this.

In short, the Defamatory Article is intentionally authored so as to lead readers to form a false impression that our clients are engaged in unlawful activities – which could not be further from the truth.

Indeed, Infoblox's publication of the Defamatory Article is analogous to an anti-virus vendor spreading rumors about a non-existent virus in order to drive its own sales.

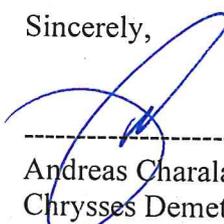
Accordingly, we require the following action **immediately upon receipt of this letter**:

- A. Remove the Defamatory Article from your website
- B. Issue a public retraction and an apology to our clients that is no less prominent than the Defamatory Article
- C. Inform all sources that distributed the Defamatory Article of your retraction and apology, and instruct them to immediately take down the Defamatory Article and any summary thereof.
- D. Publish on your website our clients' response to the Defamatory Article. I attach a copy of this response hereto and it can also be found on the PropellerAds website at the following address: <https://propellerads.com/vane-viper-defamatory-article-response/>

Our clients prefer to resolve this issue quickly and amicably. Should Infoblox fail to take immediate action to address the Defamatory Article, our clients reserve the right to take legal action including interim restraining orders against Infoblox, Inc. and the individual authors of the Defamatory Article in the Republic of Cyprus.

It goes without saying that this notice is sent without prejudice of our clients' rights.

Sincerely,



Andreas Charalambous
Chrysses Demetriades & Co LLC

September 26, 2025

VIA EMAIL

andreas.charalambous@demetriades.com

CHRYSSSES DEMETRIADES & CO LLC

Andreas Charalambous

13 Karaiskakis Street

CY-3032 Limassol

P.O. Box 50132

CY-3601 Limassol

Cyprus

Re: *Infoblox's Reporting Concerning PropellerAds and AdTech Holding*

Dear Mr. Charalambous:

As counsel to Infoblox, I write in response to your letters dated September 25, 2025, concerning a September 16, 2025, article published by Infoblox and titled "Deniability by Design: DNS-Driven Insights into a Malicious Ad Network" (the "Article").¹ Please direct all future correspondence regarding this matter to my attention.

I acknowledge my client's receipt of your September 25, 2025, letter. Please be assured that my client is committed to the accuracy of its publications, as well as to the continued exercise of its editorial discretion as appropriate. Infoblox stands by the accuracy of the Article as published, which is the result of an extensive investigation involving reliable sources and comprehensive verification.

In response to your assertion that Infoblox "made no effort to contact" your clients prior to publication to the Article, I note that my client attempted to contact your clients four times over a period of three weeks via the publicly-available abuse email address for their related company Zeydoo to report abuse and request information to efficiently report abuse to them. Infoblox received no response.

If PropellerAds and AdTech Holding believe any specific factual statements in the article are incorrect, I invite them to provide substantiating documentation or information so that we may review. Upon receipt of such material, we will promptly assess whether any corrections or updates to the Article are warranted.

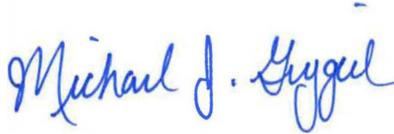
¹ Available at <https://blogs.infoblox.com/threat-intelligence/deniability-by-design-dns-driven-insights-into-a-malicious-ad-network/>.

September 26, 2025
Mr. Andreas Charalambous
Page 2

This correspondence is without prejudice, and Infoblox reserves all rights and remedies.

Regards,

GREENBERG TRAURIG, LLP

A handwritten signature in blue ink that reads "Michael J. Grygiel". The signature is written in a cursive style with a prominent initial "M".

Michael J. Grygiel

MJG/cmh/mtj

ACH/THR/0639

2 October 2025

Messers
GREENBERG TRAUIG, LLP
54 State Street,
6th Floor,
Albany,
12207, New York

Via Email : grygielm@gtlaw.com

Attention: Michael J. Grygiel

Dear Sir,

We respond to your letter dated September 26, 2025. As a threshold matter, thank you for confirming that your client Infoblox did not contact our clients PropellerAds or AdTech Holding prior to publication of the Defamatory Article – despite the fact that contact information for both PropellerAds and AdTech Holding is publicly available.

Your assertion that Infoblox purported to contact PropellerAds and AdTech Holding by emailing “their related company Zeydo” is puzzling, given that the Defamatory Article is clearly about PropellerAds and AdTech Holding and mentions Zeydo a single time in passing. In any event, any such communication to Zeydo cannot be considered an attempt to contact PropellerAds or AdTech Holding.

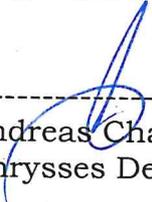
To assist us in our on-going investigation, we request that you provide us with copies of each of the four emails “to report abuse and request information to efficiently report abuse” to which you refer in your letter including the text of the email, the date, the name and email address of the sender, and the “publicly-available abuse email address” to which InfoBlox purports to have sent the four emails.





Thank you for your prompt attention to this matter.

Yours sincerely,



Andreas Charalambous
Chrysses Demetriades & Co LLC



Michael J. Grygiel
Tel.: 1+(518) 689-1406
Fax: 1+(518) 689-1499
grygielm@gtlaw.com

October 3, 2025

VIA EMAIL

CHRYSSSES DEMETRIADES & CO LLC
Andreas Charalambous
13 Karaiskakis Street
CY-3032 Limassol
P.O. Box 50132
CY-3601 Limassol
Cyprus
andreas.charalambous@demetriades.com

Re: *Infoblox's Reporting Concerning PropellerAds and AdTech Holding*

Dear Mr. Charalambous:

I write with three brief points in response to your October 2, 2025, correspondence.

First, my letter of September 26, 2025, did *not* confirm that Infoblox failed to reach out to PropellerAds or AdTech Holding prior to publication of the Article complained of by your clients. To the contrary, my previous letter explains that Infoblox “attempted to contact your clients four times over a period of three weeks via the publicly-available abuse email address for their related company Zeydoo to report abuse and request information to efficiently report abuse to them.” Again, my client never received a response to these communications.

Second, your October 2 correspondence again fails to identify any specific factual statements in the Article that are incorrect. I hereby repeat my previous invitation to PropellerAds and AdTech Holding to provide any documentation or other source information that would support any factual error in the reporting, which Infoblox will review in good faith consistent with its constitutionally protected editorial discretion.

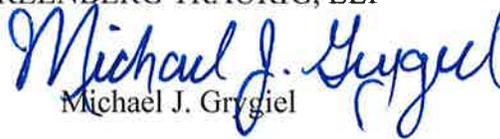
Third, the series of email communications requested in your letter of October 2 should be available at the abuse@zeydoo.com inbox if that account is what it purports to be — a place to report abusive practices, including malware actors and activities.

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Mr. Andreas Charalambous
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Infoblox continues to stand by the accuracy of the Article as published, and reserves all rights, remedies, and defenses, without limitation or compromise.

Very truly yours,

GREENBERG TRAUIG, LLP


Michael J. Grygiel

MJG/mtj

ACH/THR/0642

17 October 2025

Messers
GREENBERG TRAURIG, LLP
54 State Street,
6th Floor,
Albany,
12207, New York

Via Email : grygielm@gtlaw.com

Attention: Michael J. Grygiel

Dear Sir,

Thank you for your response.

First, You most certainly *have* confirmed that your Clients' messages in question were sent to Zeydoo and not to PropellerAds or Adtech Holding. We believe that you cannot contact a corporate entity through another corporate entity, particularly when Zeydoo was not the subject of the Defamatory Article itself. Your contention that your client "attempted to contact Zeydoo" and your silence with respect to any communications directly with PropellerAds or Adtech Holding confirms that Infoblox made no attempt to contact either PropellerAds or Adtech Holding, the actual parties mentioned in the Defamatory Article. Your attempt to spin this in another direction is quite frankly disingenuous.

Second, the email address abuse@zeydoo.com has never existed, nor has it ever been listed on Zeydoo's website or ever publicized as a contact channel. The choice of this address appears deliberate, ensuring that PropellerAds and Adtech Holding would never receive any such request for comment or inquiry before publication. In other words, it seems the address was fabricated, just as the alleged "Vane Viper" label in defamatory article was. As a result, it is clear that Infoblox's contention that *anyone* was contacted through the nonexistent abuse@zeydoo.com is untrue.



Third, we once again request that you provide copies of all four emails allegedly sent by Infoblox to the non-existent address abuse@zeydoo.com, including full headers and timestamps. Our Clients have grounds to believe that Infoblox is lying about sending these, and your failure to provide these emails only proves that the suspicion is correct.

This notice is sent without prejudice of PropellerAd's rights.

Yours sincerely,



Andreas Charalambous
Chrysses Demetriades & Co LLC

October 21, 2025

VIA EMAIL

CHRYSSSES DEMETRIADES & CO LLC
Andreas Charalambous
13 Karaiskakis Street
CY-3032 Limassol
P.O. Box 50132
CY-3601 Limassol
Cyprus
andreas.charalambous@demetriades.com

Re: *Infoblox's Reporting Concerning PropellerAds and AdTech Holding*

Dear Mr. Charalambous:

I write in response to your October 17, 2025, correspondence. Your clients' continued preoccupation with and accusations regarding Infoblox's attempts to report abuse miss the mark. As I have previously explained, those attempts were made in good faith. Infoblox has no obligation to make pre-litigation disclosures regarding those attempts and declines to do so here, particularly where such disclosure would be irrelevant to your threatened claim of defamation.

Should PropellerAds and AdTech Holding accept our invitation to provide any documentation or other source information that would support any factual error in the Article, Infoblox will review that information in good faith consistent with its constitutionally protected editorial discretion. That said, we will no longer engage with your one-sided, and increasingly hostile, pre-litigation fishing expedition.

Infoblox continues to stand by the accuracy of the Article as published, and reserves all rights, remedies, and defenses, without limitation or compromise.

Very truly yours,

GREENBERG TRAUIG, LLP


Michael J. Grygiel

MJG/klm