

EXHIBIT A

DECLARATION OF AMMAR TOWIR

I, AMMAR TOWIR, declare as follows:

1. My name is Ammar Towir, I am over the age of 18 years old, and I have personal knowledge of the facts stated herein.

2. I submit this Declaration in support of my Motion to Set Aside Clerk's Entry of Default in this action.

3. I understand that Plaintiff, DISH Network L.L.C. ("DISH"), has filed a lawsuit alleging copyright infringement relating to certain streaming services identified as Kemo IPTV and Lemo TV.

4. I admit to buying from a wholesaler and reselling to individuals outside of the United States; however, all such transactions were independent of Kemo IPTV and Lemo TV.

5. I dispute that Plaintiff has any evidence showing that I engaged in, directed, authorized, or participated in any alleged infringement in the United States.

6. I understand that DISH claims to have served me with the Complaint in this action at an address in Malaysia.

7. I do not reside in Malaysia and have not been present in Malaysia since at least as early as the date of the filing of this Action.

8. I have not operated a business from Malaysia that services any entity or customer located in the United States nor have I offered any reselling services from Malaysia to any entity or customer located in the United States. As such, I do not understand why DISH attempted to serve me at an address in Malaysia.

9. A criminal complaint has been filed against me in Dubai, where I resided at the time this Complaint was filed and service was allegedly attempted, containing similar allegations

contained in the instant Complaint.

10. In addition to not operating a streaming service business from Malaysia, I have never offered my reselling business service from the United Arab Emirates ("UAE") or Dubai into the United States. I have never used the UAE or Dubai as a location from which to conduct the business activities alleged by DISH or any of DISH's streaming service partners.

11. I have attempted to negotiate in good faith a settlement with DISH but to no avail. DISH was informed that I did not reside in Malaysia during these settlement attempts.

12. After learning of the criminal complaint filed against me in Dubai, I sought legal advice regarding the criminal investigation being conducted by authorities in Dubai.

13. Until August 31, 2026, I do not know who initiated the Dubai investigation, though I believed DISH and its streaming service partners were responsible. I now know the initiating entities include Apple Vide Programming LLC, Warner Bros. Entertainment Inc. Paramount Picture Corp., Columbia Pictures Industries Inc., Disney Enterprises Inc., Netflix US LLC, and Amazon Content Services LLC.

14. However, given the nature of the allegations and the questions I had to answer from the Dubai officials, I determined that the criminal investigation was connected to this instant case, which is why I believed DISH was involved and, hence, knew that I resided in Dubai.

15. During the course of the criminal investigation, I cooperated with authorities and provided requested information, including turning over my computing devices and smart phone.

16. As part of this process, I was contacted by the Dubai Police head office and requested to appear for more than one interview. Each time, I appeared as requested and answered all questions. Following the last interview, I was advised that the Dubai Police had completed their portion of the investigation and intended to refer the matter to the Public Prosecution for further

consideration. I was further advised that the investigative report would become available for review once it was uploaded into the Public Prosecution system, which presumably would also identify the party who filed the complaint.

17. As for August 31, 2026, I have been requested to appear again before the Public Prosecution system on September 7, 2026 to answer more questions.

18. Though I understand from my Dubai legal counsel that this process was to have taken one month, the process waiting for a decision from the Public Prosecution system is still pending, several months later.

19. Until I receive the investigative report in full, I cannot determine the full content of the pending investigation in Dubai.

20. Given the nature and content of the investigation thus far, I believe that the investigative report would be important in determining how to respond to the allegations in the instant action.

21. Based on the advice I received from Dubai authorities, I believed that it was appropriate to await the completion of the investigation and review of the report before determining how best to respond in the United States.

22. Interestingly enough, as the travel ban that is automatically instituted when a criminal complaint is filed in Dubai was about to expire, another criminal complaint was filed against me further prohibiting me from traveling.

23. At no time did I intend to disregard the authority of this Court or ignore Plaintiff's lawsuit.

24. I believe that the results of the Dubai investigation will confirm that I have never operated the alleged business from the UAE or Dubai and that there is no evidence connecting me

to the alleged conduct.

25. I respectfully request that the Court set aside the Clerk's Entry of Default so that I may have the opportunity to defend against Plaintiff's claims on the merits.

26. While this matter is pending, I intend to continue active settlement discussions with DISH in the hopes of resolving this matter amicably.

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

Executed on September 2, 2026

Ammar Towir
Ammar Towir (Sep 2, 2026 22:31:58 GMT+4)

Ammar Towir