

## Supplemental Declaration of Albert Rojas

I, Albert Rojas, submit this supplemental declaration in support of my Answer (ECF 218) to clarify key post-termination events relevant to Plaintiff's allegations.

Following my termination from Mphasis Corporation, I received two official HR documents:

EXHIBIT: A No Due Clearance form dated March 2025, and

EXHIBIT: B Formal Service Letter confirming the end of my employment.

Neither document referenced any policy violation, pending investigation, or misconduct of any kind. At the time of my departure, Mphasis did not allege that I had retained confidential information, misused systems, or engaged in unauthorized conduct. These internal records contradict the core allegations later made in the Complaint — particularly the suggestion that I was terminated for cause or due to improper behavior.

These documents were issued before the lawsuit began — before whistleblower disclosures were escalated, before any laptop dispute was raised, and before any claims of impersonation or misuse were ever made. This sequence supports my position that the lawsuit is retaliatory in nature: a strategic reversal of Mphasis's own post-employment record, triggered only after I began asserting compliance risks and protecting evidence.

### Clarification Regarding QBE Laptop and Exhibit A

Notably, **Exhibit A** — the official Mphasis “No Due Clearance” form — makes **no mention of the QBE-issued laptop** that later became the centerpiece of Plaintiff's forensic and trade secret claims. This absence is telling.

At the time of my termination, **the QBE laptop remained on my desk**, untouched, and had been completely forgotten by Mphasis and QBE. **Only after I began raising compliance concerns and documenting events did this device become an issue** — culminating in Mphasis hiring a private investigator to retrieve it.

The sequence speaks volumes. Had I not created whistleblower documentation and surfaced the lapse, the laptop would have remained unaccounted for — further exposing flaws in QBE's and Mphasis's chain-of-custody controls.

The **retroactive elevation of this overlooked device** into a central allegation underscores the retaliatory nature of this litigation — not a genuine, contemporaneous concern at the time of separation.

## Clarification Regarding Exhibit B

Exhibit B — the Mphasis-issued Formal Service Letter — reflects a clean, professional separation with **no mention of misconduct, policy violations, or pending investigations**. Instead, Mphasis formally stated:

*“We wish Albert Rodrigo Rojas success in sustaining and achieving higher levels of excellence.”*

This language stands in direct contradiction to Mphasis’s later litigation claims. If the company truly believed I had engaged in theft, misuse of confidential materials, or impersonation, no responsible employer would issue such a positive, forward-looking service letter. The **absence of any negative notation** — combined with explicit well-wishing — demonstrates that at the time of separation, Mphasis had **no intent to pursue discipline or legal action**.

Only after I began preserving evidence, raising compliance failures, and invoking my whistleblower rights did Mphasis reverse its stance — pivoting from praise to prosecution. This shift further supports my position that the Complaint was not grounded in fact, but **retaliation disguised as litigation**.

## Clarification of Post-Termination Conduct

Mphasis’s Complaint references online content and domain registrations as if they contributed to my termination. This is factually and temporally incorrect. I was terminated first — without warning, and without mention of any domains or disclosures.

Only after being wrongfully accused and shut out of all internal channels did I create those domains to preserve the record, assert my rights, and document what occurred. These efforts did not breach any policy at the time — they were a direct response to Mphasis’s sudden reversal after giving me a clean HR exit.

My actions constitute protected speech and whistleblower expression, not retroactive cause. They cannot justify a termination that had already been finalized without any claim of misconduct.

I respectfully request that the Court consider these official Mphasis-issued documents — included here as Exhibits A and B — as relevant context in assessing my good-faith conduct, the disputed nature of the allegations, and the credibility of the record I’ve submitted in response.

Executed on June 13, 2025.

Respectfully submitted,

Albert Rojas  
Pro Se Defendant

# EXHIBIT A

No Due Clearance form dated  
March 28, 2025



A R <rojas.albert@gmail.com>

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## No due clearance document

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**FFSADMIN@mphasis.com** <FFSADMIN@mphasis.com>  
To: rojas.albert@gmail.com

Fri, Mar 28, 2025 at 7:00 AM

Dear Employee,

Please find attached your No due Clearance Document. The details mentioned in your no due clearance document will be considered for full and final settlement.

HR off boarding Team.

*This is a system generated mail. Please do not reply*

Information Transmitted by this Email is Proprietary to Mphasis, its Associated Companies and/or its Customers and is Intended for use only by the Individual or Entity to which it is Addressed, and may contain Information that is Privileged, Confidential or Exempt from Disclosure under Applicable Law. If you are not the Intended Recipient or it appears that this Email has been Forwarded to you without proper Authority, you are Notified that any use or Dissemination of this Information in any manner is Strictly Prohibited. In such cases, please Notify us Immediately at [mailmaster@mphasis.com](mailto:mailmaster@mphasis.com) and delete this Email from your Records.

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 **No Due Clearance Document\_2617478.pdf**  
36K

## Full and Final Settlement IOM

Employee Code	2617478
EmployeeName	Albert Rodrigo Rojas
Designation	Senior Tech Lead
Level	6
Date of Joining	October 28, 2024
Last working date	March 13, 2025
Separation initiation date	March 13, 2025
City	NEW YORK
Tower	Mphasis Apps
Entity	Mphasis Corporation USA
EmployeeStatus	Separated
Address	319 W 18th St apartment 3F New York NY USA 10011
Personal Mail	rojas.albert@gmail.com
Mobile Number	

Clearance	Status	Amount	Unit	Remarks
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### Training Department Clearance

Tution Fee/ Certification Reimbursement	No Due	0	-	No dues
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### HROPS Department Clearance

Training Bond ( OJT)	No Due	0	-	No dues
One Time Payout	No Due	0	-	No dues
TD BOND	No Due	0	-	No dues
Service Agreement	No Due	0	USD	No dues
Other Bonus	No Due	0	USD	No dues
Leave Encashment (Number of Leaves )	Payable to the employee	5	Day(s)	

### SystemSupport Department Clearance

Desktop	No Due	0	USD	
HP Manual		No	Yes/No	
Laptop and other accessories	No Due	0	USD	
OATH Token / Active Key / RSA Token		No	Yes/No	

### Reporting Manager Clearence

Headset & Ear Cushion	No Due	0	USD	
Performance Incentive	Not Applicable	0	USD	

**Employee ID: 2617478 Employee Name: Albert Rodrigo Rojas**

Notice Period Applicable in days (As per Company Policy) Tower: Mphasis Apps	No Due	14	Day(s)	
Notice Period Served	-	1	Day(s)	
Notice Period Recovery / Waived off---- (please mention if recovery or waived off in remarks col	No Due	13	Day(s)	
Has the Individual completed all Appraisals he/she needs to complete		No	Yes/No	
Shift Allowance		No	Yes/No	
Product Support Allowance		No	Yes/No	
On call Allowance		No	Yes/No	
Will this attrition lead to revenue loss	Yes (Client doesn't want to backfill with Mphasis)	0	USD	

**Payroll Department Clearance**

Salary Advance	No Due		USD	
Stop pay/Salary Arrears ( if any)	No Due		USD	
Travel Advance	No Due		USD	
Final Settlement Due	No Due		USD	
Any other Dues	No Due		-	
Settling Loan	No Due		USD	
Inland Travel Advance	No Due		USD	
Relocation Expenses to be recovered if employee quit within a year of relocation	No Due		USD	
Hotel Accommodation advance	No Due		USD	

**Accounts Department Clearance**

Inland Travel Advance	No Due		USD	
Foreign Travel Advance	No Due		USD	
Relocation Expenses to be recovered if employee quit within a year of relocation	No Due		USD	
Corporate Cards	No Due		USD	
Hotel Accommodation advance	No Due		USD	
Corporate Cards			Yes/No	

**Other Details**

Employee ID: 2617478 Employee Name: Albert Rodrigo Rojas

HR Offboarding Comments	
Sign off	Auto sign off
Notice Period Comment	
LOP	
One Time Payout	
Recovery	

**HRBP Department Clearance**

Please update the actual date of leaving in case this has impacted due to time zone issue. (Note: Only one day difference will be accomodated.)	No Due	0	-	
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# EXHIBIT B

Formal Service Letter confirming  
the end of my employment



A R <rojas.albert@gmail.com>

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## Service Letter

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A R <rojas.albert@gmail.com>

Wed, Apr 2, 2025 at 4:23 PM

To: ggerber@levyratner.com

Cc: "rojas.albert@gmail.com" <rojas.albert@gmail.com>, albert.rojas@mphasis.it.com

Hi Georgia

Mphasis HR just sent this to me. I guess HR is trying to put a bandage on the HR email me March 14 firing me.

**Mar 14, 2025:** I was officially terminated. (**Download: 14 Mar - Termination notification 2617478 Albert Rojas.pdf**).

- Regarding HR's claim that I was "working outside the USA without authorization," this is demonstrably false. On **Friday, February 7, 2025, at 11:34 AM**, my management explicitly approved my travel at my own expense, stating:
- *"I don't want you to bear personal expenses for something that could be done remotely. If you are anyways travelling for personal stuff, then that's fine, and we can meet up in London when you are around."*
- This confirms that my travel was both authorized and personally funded. (**Download: 07 -09 Feb 2025 Fw\_ London Visit, MDU Demo & AI Cannes Festival Feb 13-15**)
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Sent from my iPhone

Begin forwarded message:

**From:** A R <rojas.albert@gmail.com>  
**Date:** April 2, 2025 at 4:37:03 PM GMT+2  
**To:** albert.rojas@mphasis.it.com  
**Subject:** Fwd: Service Letter

----- Forwarded message -----  
**From:** <FFSADMIN@mphasis.com>  
**Date:** Wed, Apr 2, 2025 at 3:05 PM  
**Subject:** Service Letter  
**To:** <rojas.albert@gmail.com>  
**Cc:** <OffshoreFNF@mphasis.com>

Dear Employee,

Greetings!

Please find enclosed your "Service letter".

In case of any clarifications please raise HR Help Desk Ticket using the following link within 7 days from the date of receipt of this e-mail : <https://mphasisin.service-now.com/ExEmployeeServiceForm>

We wish you all the best.

Regards,

Mphasis HR Offboarding Team

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 **Service Letter\_2617478.pdf**  
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**HRD/SERLTR/2025/186408**

**April 02, 2025**

**TO WHOMSOEVER IT MAY CONCERN**

This is to certify, **Albert Rodrigo Rojas (Emp. No:2617478)** was employed with us from **October 28, 2024 to March 13, 2025**. At the time of leaving the employee's designation was '**Senior Tech Lead**'.

We wish **Albert Rodrigo Rojas** success in sustaining and achieving higher levels of excellence.

**Yours Sincerely,  
For Mphasis Corporation USA**

A handwritten signature in black ink, appearing to read 'Saraswathy M S'.

**Saraswathy M S  
AVP - Lead Global HR Operations**

Access HR Helpdesk on the given link <https://mphasisin2.service-now.com/ExEmployeeServiceForm>