

EXHIBIT B – DISCLOSURE TIMELINE

Case No. D2025-4322

340B Technologies, Inc. d/b/a Nuvem (Complainant)

v.

Albert Rojas (Respondent)

This timeline summarizes the sequence of whistleblower-protected disclosures, breach reports, and retaliatory actions documented in Respondent's filings and supporting exhibits. Each event is supported by contemporaneous evidence referenced in Exhibit A and the Nuvem 340B disclosure materials.

Date (2023–2025)	Event / Evidence	Legal Relevance
Oct 17 2023	Internal email to Nuvem leadership warning that SolarWinds SQL Sentry required a 'master-key' sysadmin account exposing 340B patient data.	Protected internal disclosure – HIPAA §160.316 / DTSA §1833(b).
Oct 19 2023 09:43 AM	HHS OCR Breach Notice filed – Breach Affecting 400,000 Individuals (OMB 0945-0001).	Federal whistleblower activity, documented Exhibit A.
Oct 19 2023 10:02 AM	VP Luigi Squillante rebukes disclosure ('not your place to submit breach').	Direct evidence of retaliation / causation.
Oct 20 2023 8:32 AM	HR Alyssa Bell: 'I will save this in your file.'	Employer acknowledgment of protected act.
Oct 24 2023 10:00 AM	Termination meeting – age/sex remarks made.	Adverse action within 5 days = retaliatory timing.
Jan 21 2025	Notarized settlement executed.	Contractual baseline for later breach.
May 6 & 15 2025	Renewed whistleblower disclosures published on <nuvem.health>.	Continued protected activity.
May 16 2025	Nuvem demands website takedown as payment condition.	Unlawful retaliation under Digital Realty Trust v. Somers (2018).

Oct 24 2025

Respondent files WIPO
Response.

Evidentiary preservation
and fair-use exercise.

Source Documents: Exhibit A (HHS Breach Notice); Nuvem 340B Protected Disclosure PDF;
Personnel File emails; Settlement Agreement (2025).

Certification: I attest this timeline is true and based on contemporaneous records.

Dated: New York, New York

October 24, 2025

/s/ Albert Rojas

Albert Rojas

Respondent