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15 *Attorneys for Plaintiff*  
16 FINJAN, INC.

11 **IN THE UNITED STATES DISTRICT COURT**  
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN FRANCISCO DIVISION**

15 FINJAN, INC., a Delaware Corporation,

16 Plaintiff,

17 v.

19 JUNIPER NETWORKS, INC., a Delaware  
20 Corporation,

21 Defendant.

Case No.: 3:17-cv-05659-WHA

**DECLARATION OF JAMES HANNAH IN  
SUPPORT OF PLAINTIFF FINJAN, INC.'S  
LETTER BRIEF REGARDING MOTION  
TO COMPEL**

Date: July 5, 2018  
Time: 8:00 a.m.  
Courtroom: 12, 19th Floor  
Before: Hon. William H. Alsup

1 I, James Hannah, declare:

2 1. I am an attorney with the law firm Kramer Levin Naftalis & Frankel LLP, counsel of  
3 record for Finjan, Inc. (“Finjan”). I have personal knowledge of the facts stated herein and can testify  
4 competently to those facts. I make this declaration in support of Finjan’s Letter Brief Regarding  
5 Motion to Compel.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of email correspondence with  
7 counsel for Defendant Juniper Networks, Inc. (“Juniper”), dated from May 27, 2018 to June 21, 2018.

8 3. On May 30, 2018, counsel for Juniper and counsel for Finjan, including myself, spoke  
9 by telephone regarding language for a Stipulated Protective Order but could not come to agreement.

10 4. Finjan’s counsel has participated in Finjan’s numerous cases in the Northern District of  
11 California while also participating in Finjan’s active IPRs, including when the defendant was also the  
12 IPR petitioner: *Finjan, Inc. v. FireEye, Inc.*, Case No.: 4:13-cv-03133 (2013), and IPR2014-00344,  
13 IPR2014-00492, IPR2017-00155, IPR2017-00157; *Finjan, Inc. v. Blue Coat Systems, LLC*, Case No.:  
14 13-cv-03999 (2013); *Finjan, Inc. v. Websense, Inc.*, Case No. 13-cv-04398 (2013) and Case No. 14-cv-  
15 01353 (2014); *Finjan, Inc. v. Proofpoint, Inc.*, Case No.: 3:13-cv-05808 (2013), and IPR2016-00937,  
16 IPR2016-00966, IPR2016-00967, IPR2016-00970; *Finjan, Inc. v. Sophos, Inc.*, Case No.: 3:14-cv-  
17 01197 (2014), and IPR2015-00907, IPR2015-01022, IPR2015-01405; *Finjan, Inc. v. Symantec*, Case  
18 No.: 14-cv-02998 (2014), and IPR2015-01545, IPR2015-01546, IPR2015-01548, IPR2015-01549,  
19 IPR2015-01552, IPR2015-01892, IPR2015-01893, IPR2015-01894, IPR2015-01895, IPR2015-01897,  
20 IPR2016-00919, IPR2016-01071; *Finjan, Inc. v. Cisco Systems, Inc.*, Case No. 5:17-cv-00072 (2017),  
21 and IPR2017-02154, IPR2017-02155, IPR2018-00391; *Finjan, Inc. v. Palo Alto Networks, Inc.*, Case  
22 No.: 3:14-CV-04908 (2014), and IPR2015-01974, IPR2015-01979, IPR2015-01999, IPR2015-02000,  
23 IPR2015-02001, IPR2016-00145, IPR2016-00149, IPR2016-00150, IPR2016-00151, IPR2016-00157,  
24 IPR2016-00159, IPR2016-00164, IPR2016-00165; *Finjan, Inc. v. Blue Coat Systems, LLC*, Case No.  
25 15-cv-03295 (2015), and IPR2016-00478, IPR2016-00479, IPR2016-00480, IPR2016-00492,  
26 IPR2016-00493, IPR2016-00498, IPR2016-00890, IPR2016-00955, IPR2016-00956, IPR2016-01174,  
27 IPR2016-01441, IPR2016-01443, IPR2016-01444, IPR2017-00995, IPR2017-00996, IPR2017-00997;

1 *Finjan, Inc. v. SonicWall, Inc.*, Case No. 5:17-cv-04467 (2017); *Finjan, Inc. v. ZScaler, Inc.*, Case No.  
2 3:17-cv-06946 (2017); *Finjan, Inc. v. Bitdefender, Inc.*, Case No. 4:17-cv-04790 (2017).

3 5. Irell & Manella LLP has participated as both litigation and IPR counsel in at least the  
4 following proceedings: *B/E Aerospace v. Zodiac Aerospace*, Case No. 2:16-cv-01417 (E.D. Tex. 2016)  
5 and IPR2017-01274, IPR2017-01275, IPR2017-01273, IPR2017-01276; *Fraunhofer-Gesellschaft Zur*  
6 *Forderung der angewandten Forschung e.V. v. Sirius XM Radio Inc.*, Case No. 1-17-cv-00184 (D. Del.  
7 2017) and IPR2018-00690, IPR2018-00681, IPR2018-00682, IPR2018-00689; *Fundamental*  
8 *Innovation Systems International LLC [“FISI”] v. LG Electronics, Inc.*, Case No. 2-16-cv-01425 (E.D.  
9 Tex. 2016) and IPR2018-00683, IPR2018-00676, IPR2018-00677, IPR2018-00678, IPR2018-508,  
10 IPR2018-00493, IPR2018-00495, IPR2018-00460, IPR2018-00461; *FISI v. Samsung Electronics Co.,*  
11 *Ltd. [“Samsung”]*, Case No. 2-17-cv-00145 (E.D. Tex. 2017), and IPR2018-00620, IPR2018-00621,  
12 IPR2018-00622, IPR2018-00605, IPR2018-00606, IPR2018-00607, IPR2018-00426; *FISI v. ZTE*  
13 *Corp.*, Case No. 3-17-cv-01827 (N.D. Tex. 2017) and IPR2018-01076, IPR2018-00276, IPR2018-  
14 00274, IPR2018-00215, IPR2018-00214, IPR2018-00425, IPR2018-00110, IPR2018-00111;  
15 *Immersion Corporation v. Apple Inc.*, Case No. 1-16-cv-00077 (D. Del. 2016) and Case No. 1-16-cv-  
16 00325 (D. Del. 2016), and IPR2017-01368, IPR2017-01369, IPR2017-01371, IPR2017-01310,  
17 IPR2017-00896, IPR2017-00897, IPR2017-00887, IPR2016-01907, IPR2016-01884, IPR2016-01777,  
18 IPR2016-01603, IPR2016-01381, IPR2016-01371, IPR2016-01372; *Kaist IP US LLC v. Samsung*,  
19 Case No. 2-16-cv-01314 (E.D. Tex. 2016), and IPR2018-00266, IPR2018-00267, IPR2017-01046.

20 6. Attached hereto as Exhibit 2 is a true and correct copy of pages 11-12 of the Protective  
21 Order in *FISI LLC v. Samsung Elecs.*, Case No. 2:17-cv-00145, Dkt. No. 57 (E.D. Tex. July 21, 2017).

22 7. Attached hereto as Exhibit 3 is a true and correct of pages 12-13 of the Protective Order  
23 in *FISI LLC v. ZTE Corp.*, Case No. 3:17-cv-01827, Dkt. No. 66 (N.D. Tex. Sept. 7, 2017).

24 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
25 and correct. Executed on June 22, 2018 in Menlo Park, California.

26  
27 /s/ James Hannah  
James Hannah