

1 PAUL J. ANDRE (State Bar No. 196585)  
pandre@kramerlevin.com  
2 LISA KOBIALKA (State Bar No. 191404)  
lkobialka@kramerlevin.com  
3 JAMES HANNAH (State Bar No. 237978)  
jhannah@kramerlevin.com  
4 KRISTOPHER KASTENS (State Bar No. 254797)  
5 kkastens@kramerlevin.com  
6 KRAMER LEVIN NAFTALIS & FRANKEL LLP  
7 990 Marsh Road  
8 Menlo Park, CA 94025  
9 Telephone: (650) 752-1700  
10 Facsimile: (650) 752-1800

11 *Attorneys for Plaintiff*  
12 FINJAN, INC.

13 **IN THE UNITED STATES DISTRICT COURT**  
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
15 **SAN FRANCISCO DIVISION**

16 FINJAN, INC., a Delaware Corporation,

17 Plaintiff,

18 v.

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

21 Defendant.

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

**FINJAN’S PROPOSED REDACTIONS –**

**EXHIBIT A TO DECLARATION OF  
SHARON SONG IN SUPPORT OF  
DEFENDANT JUNIPER NETWORKS, INC.’S  
OPPOSITION TO MOTION FOR LEAVE TO  
FILE SECOND AMENDED COMPLAINT –  
REDACTED**

REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

# Exhibit A

## (Filed Under Seal)

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**PLAINTIFF FINJAN, INC.’S SECOND  
SUPPLEMENTAL OBJECTIONS AND  
RESPONSES TO DEFENDANT JUNIPER  
NETWORKS, INC.’S FIRST SET OF  
INTERROGATORIES (NO. 6)**

1 Pursuant to Fed. R. Civ. P. 26 and 33, Plaintiff Finjan, Inc. (“Finjan”) provides these  
2 supplemental responses to Defendant, Juniper Networks, Inc.’s (“Juniper” or “Defendant”) First Set of  
3 Interrogatories (“Interrogatories”) No. 6. Finjan makes these objections and responses herein  
4 (collectively “Responses”) based solely on its current knowledge, understanding, and belief as to the  
5 facts and information reasonably available to it as of the date of the Responses.

6 Additional discovery and investigation may lead to additions to, changes in, or modifications of  
7 these Responses. The Responses, therefore, are given without prejudice to Finjan’s right to further  
8 supplement these Responses pursuant to Fed. R. Civ. P. 26(e), or to provide subsequently discovered  
9 information and to introduce such subsequently discovered information at the time of any trial or  
10 proceeding in this action.

11 Finjan hereby incorporates by reference each and every general objection and objection to  
12 definition and instruction set forth in Finjan’s original and first supplemental objections and responses  
13 to Juniper’s First Set of Interrogatories into each and every specific Response as if fully set forth  
14 herein.

15 **INTERROGATORY RESPONSES**

16 **INTERROGATORY NO. 6:**

17 For each of the Patents-in-Suit, state the complete legal and factual basis for any contention that  
18 Juniper was notified of its alleged infringement and continued to infringe thereafter, including by  
19 identifying: the date of the alleged notification; any persons involved or with knowledge; the form of  
20 notification; what information was specifically conveyed in the alleged notification; what patents were  
21 specifically identified; what products were specifically identified; any documents provided to Juniper;  
22 and all other relevant facts, documents, or evidence.

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY****RESPONSE TO INTERROGATORY NO. 6:**

Finjan objects to this Interrogatory as overbroad, unduly burdensome, and oppressive to the extent it seeks information not relevant to any claim or defense of any party and/or not reasonably calculated to lead to the discovery of admissible evidence. Finjan objects to this Interrogatory to the extent it calls for a legal conclusion. Finjan objects to this Interrogatory to the extent it seeks information beyond Finjan’s actual knowledge, custody, or control. Finjan objects to this Interrogatory to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine or immunity. Finjan objects to this Interrogatory to the extent it seeks information within Defendants’ possession, custody or control, or to the extent it seeks information in the public domain; Defendant can ascertain such information from its own records or from other sources at least as readily as Finjan. Finjan objects to this Interrogatory to the extent it is compound because it is comprised of multiple discrete subparts. Finjan also objects to this Interrogatory as vague and ambiguous, including the terms “was notified of its alleged infringement” and “all other relevant facts, documents, or evidence.”

Subject to and without waiving the foregoing general and specific objections, Finjan responds as follows:

Finjan incorporates its response to Juniper’s Interrogatory No. 2.

Finjan understands based on representations by Juniper’s Senior Director of IP, Litigation and Strategy, Mr. Scott Coonan, that Juniper has either participated or spoken with a group comprised of defendants in Finjan’s prior litigations, defendants in Finjan’s currently pending litigations, and other entities that are concerned that they need a license to Finjan’s patents. Juniper has been a member of, or in communication with, this group since at least in or about November 2014. On or about November 24, 2015, Mr. Scott Coonan told Finjan about this group, and also confirmed that Juniper communicates regularly with defendants in Finjan’s other patent litigations.

Finjan filed a separate lawsuit against Palo Alto Networks, Inc. (“PAN”) on November 4, 2014, Case No. 14-cv-04908 (N.D. Cal. 2014), asserting five patents that are also asserted against Juniper in this case. Mr. Coonan told Finjan that PAN is also a member of the group. Shortly after Finjan filed its

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