

REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

DECLARATION OF SCOTT J. COONAN

1. I am employed by Juniper Networks, Inc. ("Juniper"). I have been employed with Juniper since 2004 and currently hold the title of Senior Director of IP, Litigation & Strategy. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. In July 2014, Finjan, Inc. ("Finjan") reached out to Juniper and asked Juniper to take a license to Finjan's patent portfolio. It also provided Juniper with an "exemplary" claim chart for U.S. Patent No. 6,965,968 ("968 Patent"), and asked Juniper to enter into an NDA. This is the only claim chart that Finjan ever provided to Juniper before Finjan sued Juniper.

3. Juniper informed Finjan it did not want to enter into an NDA. In addition, on February 13, 2015, I provided Finjan with ten references that Juniper believed invalidated the '968 patent.

4. After I sent Finjan the list of prior art for the '968 patent, Finjan ceased contacting Juniper for more than seven months. In November 2015, Juniper was contacted by Mr. John Garland, a consultant who was helping Finjan with its licensing efforts. At Mr. Garland's request, [REDACTED]

5. [REDACTED]

6. [REDACTED]

Executed this 28<sup>th</sup> day of June, 2018, at Raleigh, North Carolina.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
\_\_\_\_\_  
Scott J. Coonan

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## Exhibit A

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