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15 FINJAN, INC.

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FINJAN, INC., a Delaware Corporation,

Plaintiff,

v.

JUNIPER NETWORKS, INC., a Delaware Corporation,

Defendant.

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

**DECLARATION OF JOHN GARLAND IN
SUPPORT OF PLAINTIFF FINJAN, INC.'S
LETTER BRIEF OPPOSING MOTION TO
COMPEL**

Date: July 18, 2018
Time: 11:00 a.m.
Courtroom: 12, 19th Floor
Before: Hon. William H. Alsup

GARLAND DECL. IN SUPPORT OF LETTER
BRIEF OPPOSING MOTION TO COMPEL

CASE NO.: 3:17-cv-05659-WHA

KL3 3174928.1

1 I, John Garland, declare:

2 1. I conduct patent licensing negotiations on behalf of Finjan, Inc. ("Finjan"), including
3 some of the pre-suit negotiations in this action.

4 2. Since late 2015, I have been handling licensing matters for Finjan. On November 24,
5 2015, I sent an email to Ms. Julie Mar-Spinola at Finjan, who is the lawyer I confer with for legal
6 advice. The email was regarding my call with Scott Coonan, a representative on behalf of Juniper
7 Networks, Inc. Before my call, we thought Juniper was willing to engage in licensing negotiations.

8 Based on my call [REDACTED]

9 [REDACTED]
10 [REDACTED], given that Mr. Coonan was very
11 disrespectful and dismissive of our efforts to engage in good faith licensing discussions.

12 I declare under penalty of perjury under the laws of the United States that the foregoing is true
13 and correct. Executed on July 13, 2018 in Flemington, New Jersey.

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16 John Garland
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