

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)
kkastens@kramerlevin.com
5 KRAMER LEVIN NAFTALIS & FRANKEL LLP
6 990 Marsh Road
7 Menlo Park, CA 94025
8 Telephone: (650) 752-1700
9 Facsimile: (650) 752-1800

Attorneys for Plaintiff
FINJAN, INC.

10
11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**
14

15 FINJAN, INC., a Delaware Corporation,

16 Plaintiff,

17 v.

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

20 Defendant.
21

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

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

22 Date: July 18, 2018
23 Time: 11:00 a.m.
24 Courtroom: 12, 19th Floor
25 Before: Hon. William H. Alsup
26
27
28

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*.

14
15 
16 John Garland
17
18
19
20
21
22
23
24
25
26
27
28