Exhibit 2

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11
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12 JUNIPER NETWORKS, INC.

13   **UNITED STATES DISTRICT COURT**

14   **NORTHERN DISTRICT OF CALIFORNIA**

15   **SAN FRANCISCO DIVISION**

16 FINJAN, INC., a Delaware Corporation,   )   Case No. 3:17-cv-05659-WHA
)
17   Plaintiff,   )   DEFENDANT JUNIPER NETWORKS,
)   INC.'S RESPONSE TO PLAINTIFF FINJAN,
18   vs.   )   INC.'S FIRST SET OF INTERROGATORIES
)
19 JUNIPER NETWORKS, INC., a Delaware   )
   Corporation,   )
20   )
              Defendant.   )
21 _____   )

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SRX1500	✗	✗	✗	✗	✗	✗	✓	✓	✓
SRX3400	✓	✓	✓	✓	✓	✓	✗	✗	✗
SRX3600	✓	✓	✓	✓	✓	✓	✗	✗	✗
SRX4100	✗	✗	✗	✗	✗	✗	✓	✓	✓
SRX4200	✗	✗	✗	✗	✗	✗	✓	✓	✓
SRX5400	✓	✓	✓	✓	✓	✓	✓	✓	✓
SRX5600	✓	✓	✓	✓	✓	✓	✓	✓	✓
SRX5800	✓	✓	✓	✓	✓	✓	✓	✓	✓
vSRX	✗	✗	✗	✓	✓	✓	✓	✓	✓
cSRX	✗	✗	✗	✗	✗	✗	✗	✗	✗

At least the following versions of Space Security Director have been released in the U.S. since 2012: 17.2; 17.1; 16.2; 16.1; and 15.2.

INTERROGATORY NO. 3:

For the source code that You produced or made available for inspection or will produce and make available for inspection, identify the products that correspond to the source code including the name and version number of each product, the directories and subdirectories of the source code corresponding to the active source code incorporated into each of the products, the last date the source code was modified for each of the products, and which portion, if any, of the code You contend is prior art to the Asserted Patents.

RESPONSE TO INTERROGATORY NO. 3:

Juniper incorporates herein by reference all General Objections set forth above.

Juniper also specifically objects to this Interrogatory because Finjan's Interrogatories were improperly served as set forth in the General Objections above. Juniper provides this specific objection and response in an abundance of caution and in order to facilitate discovery, although this Interrogatory is moot and no response is required.

Juniper also specifically objects to this Interrogatory to the extent that it seeks information or documents that are subject to the attorney-client privilege, that evidence or constitute attorney work product, or that otherwise are not discoverable or are the subject of any other applicable

1 privilege or immunity, whether based upon statute or recognized at common law, specifically

2 including documents protected by the common interest privilege and/or joint defense agreements.

3   Juniper further specifically objects to the definition of "You" as overbroad, unduly

4 burdensome, oppressive, indefinite, vague and ambiguous. Juniper also objects to this definition

5 to the extent that it purports to impose discovery obligations on persons or entities other than the

6 parties to this action. Juniper will construe the term "You" to mean "Juniper Networks, Inc."

7   Juniper also specifically objects to the definition of "Accused Instrumentalities" as

8 including Advanced Threat Protection Appliance and Contrail. Advanced Threat Protection

9 Appliance was not identified in Finjan's Complaint by name or technology and is therefore not

10 part of this case. *See Richtek Tech. Corp. v. uPi Semiconductor Corp.*, 2016 WL 1718135, at *2

11 (N.D. Cal. Apr. 29, 2016) (Alsup, J.). Contrail is not alleged to infringe any Asserted Patent.

12 Juniper interprets this Interrogatory as excluding Advanced Threat Protection Appliance and

13 Contrail. Juniper also specifically objects to the definition of "Accused Instrumentalities" as

14 including "all previous or currently contemplated versions, revision, releases, or continuations of

15 said Juniper products and services, and all additional products accused of infringement by Finjan

16 in this action in infringement contentions or similar pleadings." This definition is objectionable at

17 least because it is overbroad and unduly burdensome and may include instrumentalities released

18 outside of the statutory damages period. Juniper will interpret this Interrogatory as limited to only

19 those instrumentalities properly identified in both the operative complaint and Finjan's

20 infringement contentions and also made, used, sold, offered for sale, or imported into the U.S.

21 within the statutory damages period.

22   Juniper also specifically objects to this Interrogatory as seeking discovery that is not

23 proportional to the needs of the case, considering the importance of the issues at stake in the

24 action, the amount in controversy, the parties' relative access to relevant information, the parties'

25 resources, the importance of the discovery in resolving the issues, and whether the burden or

26 expense of the proposed discovery outweighs its likely benefit.

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1   Juniper also objects to this Interrogatory on the grounds that it is overbroad, unduly

2 burdensome, oppressive, vague and ambiguous, not proportional to the needs of the case, and

3 seeks irrelevant information.

4   Juniper also specifically objects to this Interrogatory as premature. Juniper will produce

5 information, including invalidity contentions, in accordance with the timeline set forth in the

6 Patent Local Rules and the Court's Scheduling Order in this matter. This Response is provided

7 without prejudice to Juniper's ability to identify or produce additional information or documents

8 in response to this Interrogatory.

9   Subject to these specific objections and the general objections incorporated herein, Juniper

10 responds as follows:

11   Pursuant to Fed. R. Civ. P. 33(d), Juniper directs Finjan to the directory structure provided

12 on the secured review computer to identify the products corresponding to the source code by

13 product name and release and the directories and subdirectories of the source code corresponding

14 to the active source code incorporated into each of the products. The table below shows the

15 versions of Junos corresponding to specific SRX Gateways. Sky ATP is regularly updated;

16 pursuant to Fed. R. Civ. P. 33(d), Juniper directs Finjan to the Git log produced on the secured

17 review computer showing the complete revision commit history of Sky ATP. At least the

18 following versions of Space Security Director have been released in the U.S. since 2012: 17.2;

19 17.1; 16.2; 16.1; and 15.2.

20   Juniper does not presently intend to rely on any of the source code that it has produced as

21 prior art to the Asserted Patents; Juniper's invalidity contentions will be timely provided in

22 accordance with the Patent Local Rules.

23

	Junos 12.1	Junos 12.1X44	Junos 12.1X45	Junos 12.1X46	Junos 12.1X47	Junos 12.3X48	Junos 15.1X49	Junos 17.3	Junos 17.4
Release Date	3/28/12	1/18/13	7/17/13	12/30/13	8/18/14	3/6/15	6/30/15	8/25/17	12/21/17
SRX110	✓	✓	✓	✓	✓	✓	✕	✕	✕
SRX220	✓	✓	✓	✓	✓	✓	✕	✕	✕
SRX3XX	✕	✕	✕	✕	✕	✕	✓	✓	✓
SRX550	N/A	✓	✓	✓	✓	✓	✓	✓	✓

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