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Attorneys for Defendant
 JUNIPER NETWORKS, INC.

16 **IN THE UNITED STATES DISTRICT COURT**
 17 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 18 **SAN FRANCISCO DIVISION**

20 FINJAN, INC.,
 21 Plaintiff,
 22
 23 v.
 24 JUNIPER NETWORKS, INC.,
 25 Defendant.

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

**JOINT [PROPOSED] VOIR DIRE
 QUESTIONS**

Trial Date: December 10, 2018
 Time: 7:30 a.m.
 Place: Courtroom 12 – 19th Floor
 Judge: Hon. William Alsup

1 Good morning, ladies and gentlemen. I am Judge William Alsup and I will be presiding over
2 the trial in this matter for which a jury is about to be chosen. This case is *Finjan, Inc. v. Juniper*
3 *Networks, Inc.* Briefly stated, this is a patent infringement action under the patent laws of the United
4 States of America and relates to cyber security systems for protecting computers from malware and
5 other malicious software attacks.

6 1. Have you or any member of your immediate family ever been employed by Finjan or
7 Juniper?

8 2. Have you or any member of your family ever owned stock in, had any financial interest
9 in, or had a business relationship of any kind with either of these companies?

10 3. Have you or any member of your immediate family ever been employed by the United
11 States Patent and Trademark Office?

12 4. Has anyone ever applied for a patent? If so, in what field? Was the patent awarded to
13 you?

14 5. Do you have any opinions about the relationship between patents and the public interest
15 or any disagreement with the patent system or patent laws that might keep you from being a fair and
16 impartial juror?

17 6. Do you or any member of your immediate family have specialized knowledge of
18 computer security or antivirus products?

19 7. Have you or someone close to you ever used computer security or antivirus products?

20 8. Have any of you ever worked in the fields of computer technology, computer security,
21 data communications, telecommunications, or for any company that sells computers or computer
22 security equipment?

23 9. Do you or any member of your immediate family work as an Information Technology
24 (“IT”) professional or technician?

25 10. Have you ever served as a juror in a criminal or a civil case or as a member of a grand
26 jury in either a federal or state court?

1 11. Have you or anyone in your immediate family ever participated in a lawsuit either
2 criminal or civil as a party, such as a plaintiff or defendant, or in any other capacity such as a witness?

3 12. Does anyone have strong feelings about monetary damages awards that would cause
4 you not to be able to follow the law as I give it to you, such as an instruction to not grant monetary
5 damage awards if that is what is warranted under the law?

6 13. Does anyone have strong negative feelings about corporations that you feel would make
7 you unable to be a fair and impartial juror?

8 14. Does anyone have a religious observance or belief that would make it impossible for
9 you to listen to the evidence and make decisions about whose evidence you believe or do not believe?
10 Does anyone have a feeling that a jury should not be put in the position of having to make those
11 decisions?

12 15. Does the length of this trial or the schedule contemplated by the Court present a special
13 problem to any member of the panel?

14 16. Do you know any of the attorneys involved in the case or, to the best of your
15 knowledge, have you or any of your immediate family had any business dealings with or been
16 employed by any of these attorneys or their respective law firms?

17 17. Do you know or is any member of the panel familiar with the prospective witnesses?

18 18. Has any member of the panel heard or read anything about this case?

19 19. Have you, or to the best of your knowledge any member of your immediate family or
20 anyone close to you, had any experiences, good or bad, with Finjan or Juniper that might keep you
21 from being a fair and impartial juror?

22 20. Juniper manufactures and sells routers, switches, network management software,
23 network security products, and software-defined networking technology, including products under the
24 Juniper brand name. Have you or any member of your immediate family ever licensed or used
25 products sold by Juniper?

1 21. Finjan Mobile, a company that is affiliated with the plaintiff in this case, sells a mobile
2 security product. Have your or any member of your immediate family ever used the Finjan Mobile
3 security product?

4 22. Do you have any opinions about or experiences with the following companies M86
5 Security, Trustwave, and Webroot? If so, would the fact that one of the parties to this litigation has a
6 relationship with that company interfere in any way with your ability to render a fair and impartial
7 verdict?

8 23. Look around the room at the other potential jury members. Do you recognize any of the
9 other jurors from any encounter before today?

10 24. Have you or someone close to you had any experience with or opinions about the U.S.
11 Patent and Trademark Office that might affect your ability to be a fair and impartial juror?

12 25. Do you have any opinions about the about a company that obtains revenue from patent
13 licensing that might keep you from being a fair and impartial juror?

14 26. Do you have any opinions about the Patent Reform Act that might keep you from being
15 a fair and impartial juror?

16 27. Do you have any opinions about the U.S. Patent system or U.S. government that might
17 prevent you from keeping an open mind about whether or not a patent is valid?

18 28. Is there any member of the panel who has any special disability or problem that would
19 make serving as a member of the jury difficult or impossible?

20 29. Having heard the questions put to you by the court, does any other reason suggest itself
21 to you as to why you could not sit on this jury and render a fair verdict based on the evidence presented
22 to you and in the context of the Court's instructions to you on the law?