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15 *Attorneys for Plaintiff*  
16 FINJAN, INC.

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

14 FINJAN, INC., a Delaware Corporation,

15 Plaintiff,

16 v.

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

19 Defendant.

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

**DECLARATION OF AUSTIN MANES IN  
SUPPORT OF PLAINTIFF FINJAN, INC.'S  
OPPOSITIONS TO DEFENDANT  
JUNIPER NETWORKS, INC.'S MOTIONS  
IN LIMINE NOS. 1-3**

Date: December 4, 2018  
Time: 9:00 a.m.  
Courtroom: Courtroom 12, 19th Floor  
Before: Hon. William Alsup

1 I, Austin Manes, declare:

2 1. I am licensed to practice law in the State of California and am an attorney at Kramer  
3 Levin Naftalis & Frankel LLP, counsel of record for Finjan, Inc. ("Finjan"). I have personal  
4 knowledge of the facts stated herein. I make this declaration in support of Plaintiff Finjan, Inc.'s  
5 Oppositions to Juniper Networks, Inc.'s ("Juniper") Motions *in Limine* Nos. 1-3.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of a document entitled "Juniper  
7 Advanced Anti-Malware Service on SRX Software Functional Specification, bearing bates numbers  
8 JNPR-FNJN\_29002\_00173278-340.

9 3. Attached hereto as Exhibit 2 is a true and correct copy of page 50 from the transcript of  
10 Raju Manthena, taken on May 30, 2018.

11 4. Attached hereto as Exhibit 3 is a true and correct copy page 188 from the transcript of  
12 Yuly Tenorio, taken on May 9, 2018.

13 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from Juniper's Form  
14 10-Q for the quarterly period ended September 30, 2017, bearing bates numbers FINJAN-JN 042683,  
15 42692.

16 6. Attached hereto as Exhibit 5 is a true and correct copy of a webpage entitled "Juniper  
17 Networks Acquires Security Firm Cyphort," dated August 31, 2017, available from  
18 <https://www.sdxcentral.com/articles/news/juniper-networks-acquires-security-firm-cyphort/2017/08>.

19 7. Attached hereto as Exhibit 6 is a true and correct copy of a letter from Finjan to  
20 Cyphort, dated February 9, 2015, bearing bates numbers FINJAN-JN 180255-66.

21 8. Attached hereto as Exhibit 7 is a true and correct copy of a letter from Finjan to  
22 Pillsbury Winthrop Shaw Pittman LLP, dated January 28, 2016, bearing bates numbers FINJAN-JN  
23 193290-92.

24 9. Attached hereto as Exhibit 8 is a true and correct copy of a Finjan presentation entitled,  
25 "Patent Licensing Discussions", dated March 23, 2016, bearing bates numbers FINJAN-JN 193230-69.

26 10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from Juniper's  
27 Second Supplemental Response to Finjan's First Set of Interrogatories, served on June 18, 2018.

1 11. Attached hereto as Exhibit 10 is a true and correct copy of a transcript of Mr. Coonan  
2 and John Garland's conversations, bearing bates numbers JNPR-FNJJN\_29011\_00960575-91.

3 12. Attached hereto as Exhibit 11 is a true and correct copy of pages 51 and 173-174 from  
4 the transcript of the deposition of Scott Coonan, taken on November 16, 2018.

5 13. Attached hereto as Exhibit 12 is a true and correct copy of an email from RPX Weekly  
6 Newsletter to Scott Coonan, dated November 7, 2016, bearing bates numbers JNPR-  
7 FNJJN\_29011\_00960426-29.

8 14. Attached hereto as Exhibit 13 is a true and correct copy of an email from RPX Weekly  
9 Newsletter to Scott Coonan, dated March 4, 2016, bearing bates numbers JNPR-  
10 FNJJN\_29011\_00960480-92.

11 15. Attached hereto as Exhibit 14 is a true and correct copy of pages 10, 17-20 and  
12 demonstrative slides 13, 15, 20 from the Expert Rebuttal Report of Dr. Alessandro Orso, served on  
13 October 11, 2018.

14  
15 I declare under penalty of perjury under the laws of the United States of America that each  
16 of the above statements is true and correct. Executed on November 23, 2018, in San Francisco,  
17 CA.

18 /s/ Austin Manes  
19 Austin Manes  
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