

Exhibit 1

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1 whether SRX customers had enabled a license to Sky
 2 ATP?
 3 MS. CAIRE: Objection; form.
 4 THE WITNESS: It was relevant insofar as
 5 I'm aware that that's been made part of the
 6 discovery record in this case.
 7 BY MS. CARSON:
 8 Q. Do you know how many SRX customers in the
 9 U.S. during the damages period enabled a license to
 10 Sky ATP?
 11 MS. CAIRE: Objection; form.
 12 THE WITNESS: My recollection is that
 13 Juniper does not track that information and that's
 14 not evidence that's available in the case. So I
 15 don't know.
 16 BY MS. CARSON:
 17 Q. How many Sky ATP licenses did you identify
 18 in your analysis?
 19 A. I would refer you to supplemental Exhibit
 20 1.4, which identifies 211 Sky ATP units in the U.S.
 21 and 547 worldwide between Q4 2015 and Q1 2017.
 22 Q. When you say "units," do you mean licenses?
 23 A. If memory serves, those are paid licenses.
 24 Q. Okay. Was that relevant to your analysis?
 25 MS. CAIRE: Objection; form.

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1 THE WITNESS: It's part of my analysis.
 2 BY MS. CARSON:
 3 Q. Would you agree that that -- what was the
 4 number, 220? Is that what you said?
 5 A. I quantified --
 6 Q. Oh, 211, sorry. Just strike my question.
 7 A. Sure.
 8 Q. Would you agree that 211 licenses
 9 represents a relatively small proportion of the
 10 overall SRX units?
 11 MS. CAIRE: Objection; form.
 12 THE WITNESS: Arithmetically, it does.
 13 BY MS. CARSON:
 14 Q. It's less than 1 percent; correct?
 15 MS. CAIRE: Objection; form.
 16 THE WITNESS: (Witness using calculator.)
 17 Yes.
 18 (Deposition Exhibit 1164 was marked for
 19 identification)
 20 BY MS. CARSON:
 21 Q. In the Exhibit 1064 -- do you see that?
 22 MS. CAIRE: Counsel, it's 1164.
 23 MS. CARSON: 1164. Sorry. Still back at
 24 last week.
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1 BY MS. CARSON:
 2 Q. All right. Taking a look at Exhibit 1164,
 3 this is a web page from Juniper's website that's
 4 entitled "Juniper Sky Advanced Threat Prevention
 5 Installation Overview."
 6 Do you see that?
 7 A. Yes.
 8 Q. And do you see it says:
 9 "Although Juniper Sky ATP is a free add-on
 10 to an SRX Series device, you must still
 11 enable it prior to using it."
 12 Do you see that?
 13 A. Yes.
 14 Q. And just to be clear, it's my understanding
 15 that, in performing your analysis, you did not
 16 endeavor to determine how many customers had enabled
 17 a Sky ATP license; correct?
 18 A. Incorrect.
 19 Q. You did endeavor to determine how many Sky
 20 ATP licenses had been enabled?
 21 A. Yes. Again, my understanding is that's not
 22 tracked by Juniper and that information is not
 23 available.
 24 Q. What is that understanding based upon?
 25 A. If memory serves, there were some

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1 interrogatory responses that related to the absence
 2 of information about this subject matter.
 3 Q. If that information were available to you,
 4 would it have impacted your analysis?
 5 MS. CAIRE: Objection; form.
 6 THE WITNESS: I don't think so in a
 7 material way for the reasons that we've talked about
 8 today.
 9 BY MS. CARSON:
 10 Q. So if you had learned that only 100
 11 customers had enabled a free license to Sky ATP
 12 during the damages period, that wouldn't impact your
 13 analysis in any way?
 14 MS. CAIRE: Objection; form.
 15 THE WITNESS: I don't think so. No.
 16 My analysis was based on the cost savings
 17 methodology, as we've talked about this morning.
 18 BY MS. CARSON:
 19 Q. You served an errata on November 1st;
 20 correct?
 21 A. I don't know when that was sent to you, but
 22 that sounds right, because I think we were working
 23 on it on Halloween. So that timing sounds
 24 consistent.
 25 Q. Was the errata your idea?