

Exhibit 2

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14 Attorneys for Plaintiff
15 FINJAN, INC.

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

19 FINJAN, INC., a Delaware Corporation,

20 Plaintiff,

21 v.

22 JUNIPER NETWORKS, INC., a Delaware
23 Corporation,

24 Defendant.

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

**PLAINTIFF FINJAN, INC.'S FIRST SET
OF REQUESTS FOR PRODUCTION OF
DOCUMENTS TO DEFENDANT
JUNIPER NETWORKS, INC. (NOS. 1-60)**

1 6. The term “Accused Instrumentalities” shall include the following Juniper products and
2 services: Defendant’s SRX Gateways including the: SRX110; SRX220; SRX300; SRX550; SRX1400;
3 SRX1500; SRX3400; SRX3600; SRX4000; SRX5400; SRX5600; and SRX5800 gateway appliances,
4 as well as the vSRX Virtual Firewall and cSRX Container Firewall (collectively, “SRX Gateways”) as
5 described in the Complaint, including but not limited to at Exhibit 9 and paragraphs 43-52;
6 Defendant’s Sky Advanced Threat Protection or “Sky ATP” and Advanced Threat Protection
7 Appliance, as described in the Complaint, including but not limited to at Exhibit 10 and paragraphs 43-
8 52; Defendant’s Junos Space Security Director, as described in the Complaint, including but not
9 limited to at Exhibit 16 and paragraphs 43-52; and Defendant’s Contrail, as described in the
10 Complaint, including but not limited to at Exhibit 17 and paragraphs 43-52. The term “Accused
11 Instrumentalities” shall also include any and all previous or currently contemplated versions, revisions,
12 releases, or continuations of said Juniper products and services, and all additional products accused of
13 infringement by Finjan in this action in infringement contentions or similar pleadings.

14 7. The term “person” or “entity” shall refer to any individual, corporation, proprietorship,
15 association, joint venture, company, partnership, or other business or legal entity, including
16 governmental bodies and agencies. The masculine includes the feminine and vice versa; the singular
17 includes the plural and vice versa.

18 8. The term “document(s)” shall have the broadest meaning ascribed to it by Federal Rule
19 of Civil Procedure 34 and Federal Rule of Evidence 1001, and shall include within its meaning any and
20 all papers, videotapes or video recordings, photographs, films, recordings, memoranda, books, records,
21 accounts, letters, telegrams, correspondence, notes of meetings, notes of conversations, notes of
22 telephone calls, inter-office memoranda or written communications of any nature, recordings of
23 conversations either in writing or by means of any mechanical or electrical recording device, notes,
24 papers, reports, analyses, invoices, canceled checks or check stubs, receipts, minutes of meetings, time
25 sheets, diaries, desk calendars, ledgers, schedules, licenses, financial statements, telephone bills, logs,
26 and any differing versions of the foregoing whether denominated formal, informal, or otherwise, as
27 well as copies of the foregoing which differ in any way, including handwritten notations or other
28

1 **REQUEST FOR PRODUCTION NO. 18:**

2 Documents, communications, or things sufficient to show the in-licensing or out-licensing of
3 patents or technology related to the Accused Instrumentalities.

4 **REQUEST FOR PRODUCTION NO. 19:**

5 Documents, communications, or things sufficient to show the first offer for sale and sale of each
6 of the Accused Instrumentalities.

7 **REQUEST FOR PRODUCTION NO. 20:**

8 Documents, communications, or things sufficient to show any sales or revenue generated from
9 each of the Accused Instrumentalities from the year 2012 to the present.

10 **REQUEST FOR PRODUCTION NO. 21:**

11 Documents, communications, or things sufficient to show the sales or revenue forecasts for each
12 of the Accused Instrumentalities generated in the past six (6) years, which forecast sales or revenue for
13 the year 2012 or any year past 2012.

14 **REQUEST FOR PRODUCTION NO. 22:**

15 Documents, communications, or things sufficient to show the market share of each of the
16 Accused Instrumentalities.

17 **REQUEST FOR PRODUCTION NO. 23:**

18 Documents, communications, or things sufficient to show the pricing of each of the Accused
19 Instrumentalities from the year 2012 to the present.

20 **REQUEST FOR PRODUCTION NO. 24:**

21 Documents, communications, or things sufficient to show the costs associated with of each of
22 the Accused Instrumentalities from the year 2012 to the present, including but not limited to,
23 production costs, marketing costs, distribution costs, research and development costs, advertising costs
24 and costs to update.

25 **REQUEST FOR PRODUCTION NO. 25:**

26 Documents, communications, or things sufficient to show the gross profits of each of the
27 Accused Instrumentalities from the year 2012 to the present.

1 **REQUEST FOR PRODUCTION NO. 60:**

2 Documents, communications, or things sufficient to show any of Your business plans within
3 the past six (6) years.

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6 Dated: February 23, 2018

By: /s/ Kristopher Kastens
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