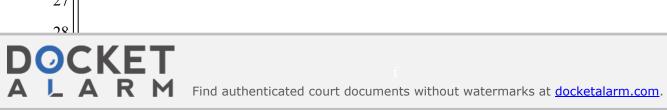
Exhibit 2

1 2	pandre@kramerlevin.com LISA KOBIALKA (State Bar No. 191404) lkobialka@kramerlevin.com JAMES HANNAH (State Bar No. 237978) jhannah@kramerlevin.com KRISTOPHER KASTENS (State Bar No. 254797) kkastens@kramerlevin.com KRAMER LEVIN NAFTALIS & FRANKEL LLP 990 Marsh Road Menlo Park, CA 94025	
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8	Facsimile: (650) 752-1800	
9	Attorneys for Plaintiff FINJAN, INC.	
10		TATEC DICTRICT COURT
11	IN THE UNITED STATES DISTRICT COURT	
12	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
13	SAN FRANCICO DIVISION	
14	FINJAN, INC., a Delaware Corporation,	Case No.: 3:17-cv-05659-WHA
15	Plaintiff,	PLAINTIFF FINJAN, INC.'S FIRST SET
16	v.	OF REQUESTS FOR PRODUCTION OF
17	JUNIPER NETWORKS, INC., a Delaware Corporation,	DOCUMENTS TO DEFENDANT JUNIPER NETWORKS, INC. (NOS. 1-60)
18		
19	Defendant.	
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- 6. The term "Accused Instrumentalities" shall include the following Juniper products and services: Defendant's SRX Gateways including the: SRX110; SRX220; SRX300; SRX550; SRX1400; SRX1500; SRX3400; SRX3600; SRX4000; SRX5400; SRX5600; and SRX5800 gateway appliances, as well as the vSRX Virtual Firewall and cSRX Container Firewall (collectively, "SRX Gateways") as described in the Complaint, including but not limited to at Exhibit 9 and paragraphs 43-52; Defendant's Sky Advanced Threat Protection or "Sky ATP" and Advanced Threat Protection Appliance, as described in the Complaint, including but not limited to at Exhibit 10 and paragraphs 43-52; Defendant's Junos Space Security Director, as described in the Complaint, including but not limited to at Exhibit 16 and paragraphs 43-52; and Defendant's Contrail, as described in the Complaint, including but not limited to at Exhibit 17 and paragraphs 43-52. The term "Accused Instrumentalities" shall also include any and all previous or currently contemplated versions, revisions, releases, or continuations of said Juniper products and services, and all additional products accused of infringement by Finjan in this action in infringement contentions or similar pleadings.
- 7. The term "person" or "entity" shall refer to any individual, corporation, proprietorship, association, joint venture, company, partnership, or other business or legal entity, including governmental bodies and agencies. The masculine includes the feminine and vice versa; the singular includes the plural and vice versa.
- 8. The term "document(s)" shall have the broadest meaning ascribed to it by Federal Rule of Civil Procedure 34 and Federal Rule of Evidence 1001, and shall include within its meaning any and all papers, videotapes or video recordings, photographs, films, recordings, memoranda, books, records, accounts, letters, telegrams, correspondence, notes of meetings, notes of conversations, notes of telephone calls, inter-office memoranda or written communications of any nature, recordings of conversations either in writing or by means of any mechanical or electrical recording device, notes, papers, reports, analyses, invoices, canceled checks or check stubs, receipts, minutes of meetings, time sheets, diaries, desk calendars, ledgers, schedules, licenses, financial statements, telephone bills, logs, and any differing versions of the foregoing whether denominated formal, informal, or otherwise, as well as copies of the foregoing which differ in any way, including handwritten notations or other

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REQUEST FOR PRODUCTION NO. 18:

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

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REQUEST FOR PRODUCTION NO. 19:

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

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REQUEST FOR PRODUCTION NO. 20:

8

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

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REQUEST FOR PRODUCTION NO. 21:

11

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

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REQUEST FOR PRODUCTION NO. 22:

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

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REQUEST FOR PRODUCTION NO. 23:

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

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REQUEST FOR PRODUCTION NO. 24:

2122

Documents, communications, or things sufficient to show the costs associated with of each of the Accused Instrumentalities from the year 2012 to the present, including but not limited to,

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production costs, marketing costs, distribution costs, research and development costs, advertising costs and costs to update.

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REQUEST FOR PRODUCTION NO. 25:

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

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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. 4 5 Dated: February 23, 2018 By: /s/ Kristopher Kastens 6 Paul J. Andre (State Bar. No. 196585) Lisa Kobialka (State Bar No. 191404) 7 James Hannah (State Bar No. 237978) Kristopher Kastens (State Bar No. 254797) 8 KRAMER LEVIN NAFTALIS 9 & FRANKEL LLP 990 Marsh Road 10 Menlo Park, CA 94025 Telephone: (650) 752-1700 11 Facsimile: (650) 752-1800 12 pandre@kramerlevin.com lkobialka@kramerlevin.com 13 jhannah@kramerlevin.com kkastens@kramerlevin.com 14 15 16 17 18 19 20 21 22 23 24 25 26 27

