


EXHIBIT 4

Case Clip(s) Detailed Report
Thursday, December 13, 2018, 7:27:30 AM

Finjan v. Juniper

 **Gupta, Shelly (Vol. 01) - 12/07/2018**

1 CLIP (RUNNING 00:12:14.590)

 Plaintiff's Deposition Designations for Shelly Gupta - with Juniper's Counters (12-07-18)

SG1207-C

16 SEGMENTS (RUNNING 00:12:14.590)



1. PAGE 6:05 TO 6:10 (RUNNING 00:00:10.805)

05 Q. Please state your name for the record.
06 A. Shelly Gupta.
07 Q. Where do you work?
08 A. Juniper Networks.
09 Q. What is your position?
10 A. Senior Director of Finance.

2. PAGE 23:10 TO 23:11 (RUNNING 00:00:05.261)

10 Q. (By Mr. Manes) Could you please open Exhibit 5
11 on the computer in front of you.

3. PAGE 23:14 TO 23:14 (RUNNING 00:00:11.465)

14 THE WITNESS: Okay. Exhibit 5. Got it.

4. PAGE 23:15 TO 23:21 (RUNNING 00:00:23.384)

15 Q. (By Mr. Manes) You've seen this document
16 before; correct?
17 A. Yes, I have.
18 Q. Do you know what it is?
19 A. My understanding of this document is that it
20 contains information about SRX units on which the free
21 Sky ATP license was enabled.

5. PAGE 50:03 TO 50:08 (RUNNING 00:00:17.812)

03 Q. (By Mr. Manes) And on the printout, the grand
04 total of shipment quantity at serial number is 121;
05 correct?
06 A. On the printout that you show me, yes. The
07 grand total is 121 for shipment quantity at serial
08 number.

6. PAGE 51:11 TO 51:16 (RUNNING 00:00:21.226)

11 Q. And please filter by the 13 SKU numbers that
12 are on the printout that I've handed you. And let me
13 know if the grand totals in the printout that I've
14 handed you accurately reflect the drop ship tab of
15 Exhibit 5?
16 A. So I'm going to go to Column M, which says

7. PAGE 51:17 TO 51:21 (RUNNING 00:01:21.221)

17 "material over length part number key." I will select
18 SRX1500-AC, SRX1500-CHAS, SRX300, SRX340, SRX345,
19 SRX4100-AC, SRX4200-AC, SRX5400E-B2-AC,
20 SRX5400X-B5-AC-BB, SRX5600X-BASE, SRX5800BASE-HC-DC,
21 SRX5800E-B1-AC-TAA, and SRX5800X-BASE.

8. PAGE 51:22 TO 52:04 (RUNNING 00:00:52.233)

22 These are all the SKUs that are on the printed
23 copy, and they seem to be the complete list of SKUs on
24 the spreadsheet as well. If I filter on them and I do a
25 sum total of Column G, which is the shipment -- sorry --

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00052:01 of Column H, which is the shipment net value, the sum
 02 total is 7,219,586.09, which matches the number
 03 represented in the grand total of shipments net value.
 04 The printed copy that was handed to me.

9. PAGE 52:05 TO 52:11 (RUNNING 00:00:33.807)

05 If I do a sum total of Column G, which is the
 06 shipment quantity, the sum total is 2,162, which matches
 07 the shipment quantity column on the printed copy.
 08 And if I do a sum total of Column E, which is
 09 the shipment quantity at serial number, it is 121, which
 10 matches the sum of shipment quantity at serial number
 11 column grand total on the printed copy.

10. PAGE 52:22 TO 53:08 (RUNNING 00:00:25.504)

22 Q. (By Mr. Manes) Can we agree that all of the
 23 numbers that we've just went over are accurately
 24 reflected on the printout as you've just read them from
 25 the drop ship tab?
 00053:01 A. So all the numbers that we looked at and we
 02 tied one by one, yes, they tie -- for the columns that
 03 we looked at tie with the columns that are represented
 04 on the printed copy.
 05 Q. Okay.
 06 I'd like to mark the printed copy I've handed
 07 you as Exhibit 12.
 08 (Exhibit 12 was marked for identification.)

11. PAGE 53:09 TO 53:09 (RUNNING 00:00:03.422)

09 Q. (By Mr. Manes) Please open back up Exhibit 3.

12. PAGE 69:04 TO 70:21 (RUNNING 00:03:29.162)

04 Q. Please push "okay."
 05 For Cell B5, what number do you have under the
 06 sum of achievement net for Branch SRX products?
 07 A. So for the products that we just selected, Cell
 08 B5 on my spreadsheet shows 4,866,086.
 09 Q. For Cell C5, what value do you show for the sum
 10 of achievement cost for the Branch SRX Series -- or
 11 Branch SRX category? Excuse me.
 12 A. So for Cell C5, which is the sum of achievement
 13 cost for the Branch SRX SKUs that we just selected, it
 14 shows 2,423,095.
 15 Q. And for Cell D5 under Branch SRX category, what
 16 value do you show in the sum of achievement quantity?
 17 A. Sum of achievement quantity in Cell B5 for the
 18 SKUs that we selected under Branch SRX shows 5,546.
 19 Q. Moving down to Row 16, which shows the High-End
 20 SRX Series, what value do you show in Cell B16, which is
 21 the sum of achievement net for the High-End SRX Series?
 22 A. Cell B16, for the High-End SRX Series SKUs that
 23 we selected, sum of achievement net is 7,913,610.
 24 Q. For Cell C16?
 25 A. Cell C16, which is sum of achievement cost for
 00070:01 the High-End SRX SKUs that we selected, it shows
 02 1,468,930.
 03 Q. And for Cell D16?
 04 A. D16, which is the sum of achievement quantity
 05 for High-End SRX SKUs that we selected, it is 235.
 06 Q. And for Cell B22, which is the Mid-End SRX
 07 Series?
 08 A. Cell B22 for Mid-End SRX Series for the SKUs
 09 that we selected reads 2,571,104.
 10 Q. And Cell C22?

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11 A. C22, which is the sum of achievement cost for
12 Mid-End SRX Series for SKUs that we selected, it reads
13 1,274,531.

14 Cell D22 which is sum of quantity for the
15 Mid-End Series SKUs that we selected, it reads 713.

16 Q. And for Cell B27?

17 A. Cell B27, which is Sky ATP for SKUs that we
18 selected, it reads 614,840; Cell C27 reads 0; and Cell
19 D27 reads 219.

20 Q. And just for the record, Cell C27 is the sum of
21 achievement cost for Sky ATP; correct?

13. PAGE 70:23 TO 71:22 (RUNNING 00:01:45.267)

23 Q. (By Mr. Manes) In the view that we're looking
24 at here.

25 A. So what we're looking at is Column C represents
00071:01 sum of achievement cost.

02 Q. And Cell C27 in this view would represent the
03 sum of achievement cost for Sky ATP; correct?

04 A. So as I said, Column C is the achievement --
05 sum of achievement cost for the SKUs that is represented
06 in Cell -- in Column A.

07 Q. Right. And so Cell C27 reads zero; correct?

08 A. Cell C27 reads zero.

09 Q. And Cell D27 reads what?

10 A. Cell D27 reads 219.

11 Q. And finally in Row 41, which is the grand total
12 of the SKUs that we selected, Cell B41 reads what as a
13 grand total for the sum of achievement net for the SKUs
14 that we selected?

15 A. Cell B41, grand total reads 15,965,640.

16 Q. Cell C41 reads what for sum of achievement cost
17 for the SKUs that we selected?

18 A. Cell C41, which is the grand total column,
19 reads 5,166,556.

20 Q. And Cell D41, which is sum of achievement
21 quantity, reads what for the grand total?

22 A. Cell D41, grand total reads 6,713.

14. PAGE 71:23 TO 72:07 (RUNNING 00:00:26.468)

23 Q. Could you please save the current pivot table
24 that you're looking at on your -- on the laptop in front
25 of you. Save it as a local copy, if you know how to do
00072:01 that.

02 MS. CURRAN: Do you want her to save it to the
03 desktop?

04 MR. MANES: Save it to the desktop, please.

05 THE WITNESS: Then should I name it
06 differently?

07 MR. MANES: We can name it Exhibit 13.

15. PAGE 95:24 TO 96:10 (RUNNING 00:00:36.033)

24 Q. (By Mr. Manes) Ms. Gupta, off the record, we
25 saved the pivot table from what has been marked as
00096:01 Exhibit 13 as a new pdf on your laptop with both counsel
02 and yourself watching; is that correct?

03 A. That's correct.

04 Q. Can you please verify that the PDF that we just
05 discussed matches the pivot table of Exhibit 13 and the
06 values are accurate.

07 A. Yep.

08 MR. MANES: I'd like to mark that pdf as
09 Exhibit 16.

10 (Exhibit 16 was marked for identification.)

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16. PAGE 97:01 TO 97:21 (RUNNING 00:01:11.520)

00097:01 Q. And I believe you mentioned a difference
02 between the drop ship sheet and the US_prod sheet in
03 terms of calculating figures. Could you just expand on
04 that.
05 A. Okay.
06 So my understanding is that US_prod tab
07 includes the free Sky ATP license, includes the
08 information around the free Sky ATP licenses that were
09 enabled on the SRX SKUs. So -- or the other way to say
10 it would be it is those SRX SKUs for which the device
11 I.D. is mentioned in Column A, on which the free Sky ATP
12 licenses were enabled.
13 That is what US_prod column -- US_prod
14 spreadsheet says.
15 Q. And how does that differ from the drop ship
16 sheet, if at all?
17 A. So drop ship is the total subset -- is the
18 total population, and US_prod is just those relevant SRX
19 SKUs on which the free Sky ATP licenses have been
20 enabled. So drop ship is a much larger population, and
21 US_prod is a subset of that information.

TOTAL: 1 CLIP FROM 1 DEPOSITION (RUNNING 00:12:14.590)