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)

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

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10      Q.    (By Mr. Manes)  Could you please open Exhibit 5
11   on the computer in front of you.
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3. PAGE 23:14 TO 23:14 (RUNNING 00:00:11.465)

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14            THE WITNESS:  Okay.  Exhibit 5.  Got it.
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4. PAGE 23:15 TO 23:21 (RUNNING 00:00:23.384)

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

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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)

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

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

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      09      Q.    (By Mr. Manes)  Please open back up Exhibit 3.
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12. PAGE 69:04 TO 70:21 (RUNNING 00:03:29.162)

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      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)

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

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      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)

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