# EXHIBIT 1

## **Curran, Casey**

From: Kastens, Kris < KKastens@KRAMERLEVIN.com>

Sent: Thursday, January 3, 2019 11:35 AM

**To:** Glucoft, Josh; ~Andre, Paul; ~Caire, Yuridia; ~Hannah, James; ~Hedvat, Shannon;

~Kobialka, Lisa; ~Lee, Hannah; ~Lee, Michael; ~Manes, Austin; ~Martinez, Cristina;

~Nguyen, Stephanie; ~Xu, Linjun

**Cc:** Carson, Rebecca; Curran, Casey; Heinrich, Alan; Holland, Eileen; Isaac, Shawana; Kagan,

Jonathan; Manzano, Jim; Petersen, Ingrid; Quarnstrom, Brian; Song, Sharon; Theilacker,

Leah; Wang, Kevin

**Subject:** Finjan v. Juniper

Josh,

Regarding the '494 and '780 Patents, the Court specifically excluded any determination of infringement of the ATP Appliance from the early summary judgment. As such, the claims of the '494 Patent and '780 Patent that were addressed during early summary judgment are still pending for the infringement of this product.

Also, we are available at 1PM on Wednesday, January 9<sup>th</sup> to discuss the joint defense/common interest issue. We'll call your office.

Provide alternative dates for the 30(b)(6) deposition.

Sincerely, Kris

### Kris Kastens

Partner

Kramer Levin Naftalis & Frankel LLP 990 Marsh Road, Menlo Park, California 94025 T 650.752.1715 F 650.752.1815 kkastens@kramerlevin.com

#### <u>Bio</u>

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From: Glucoft, Josh <JGlucoft@irell.com>
Sent: Wednesday, January 2, 2019 12:42 PM

**To:** Andre, Paul <PAndre@KRAMERLEVIN.com>; Caire, Yuridia <YCaire@KRAMERLEVIN.com>; Hannah, James <JHannah@KRAMERLEVIN.com>; Hedvat, Shannon H. <SHedvat@KRAMERLEVIN.com>; Kastens, Kris <KKastens@KRAMERLEVIN.com>; Kobialka, Lisa <LKobialka@KRAMERLEVIN.com>; Lee, Hannah <HLee@KRAMERLEVIN.com>; Lee, Michael H. <MHLee@KRAMERLEVIN.com>; Manes, Austin



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<AManes@KRAMERLEVIN.com>; Martinez, Cristina <CMartinez@KRAMERLEVIN.com>; Nguyen, Stephanie
<SNguyen@KRAMERLEVIN.com>; Xu, Linda <LXu@KRAMERLEVIN.com>

**Cc:** Carson, Rebecca <RCarson@irell.com>; Curran, Casey <ccurran@irell.com>; Glucoft, Josh <JGlucoft@irell.com>; Heinrich, Alan <AHeinrich@irell.com>; Holland, Eileen <EHolland@irell.com>; Isaac, Shawana <SIsaac@irell.com>; Kagan, Jonathan <JKagan@irell.com>; Manzano, Jim <JManzano@irell.com>; Petersen, Ingrid <ipetersen@irell.com>; Quarnstrom, Brian <BQuarnstrom@irell.com>; Song, Sharon <ssong@irell.com>; Theilacker, Leah <LTheilacker@irell.com>; Wang, Kevin <kwang@irell.com>; #Juniper/Finjan [Int] <Juniper-Finjan@irell.com> **Subject:** [EXTERNAL] Discovery

Kris,

Juniper agrees to perform a reasonable search for the documents related to Joe Security that you identified in your December 20 letter.

Please provide times on Wednesday, January 9 that you are available to confer regarding documents that have been withheld pursuant to a joint defense/common interest privilege.

Lastly, Finjan failed to confirm the proposed January 8 date for the deposition of Juniper's 30(b)(6) witness on Topic 1. *See* 11/19/2018 Glucoft email to Kastens. As a result of Finjan's failure to respond, this deposition will be rescheduled.

Thanks, Josh

Joshua P. Glucoft | Irell & Manella LLP | 310.203.7189 | www.irell.com

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