

REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

DECLARATION OF FRANK JAS

I, Frank Jas, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration, and I could and would testify competently thereto if called upon to do so.

2. I am a Distinguished Engineer with Juniper Networks, Inc. (“Juniper”). Prior to working at Juniper, I was Chief Technology Officer with Cyphort Inc. (“Cyphort”). Cyphort was acquired by Juniper in September 2017 and the Cyphort product catalog was rebranded in March 2018 to Juniper Advanced Threat Protection Appliance (collectively, “ATP Appliance”). During my time with Juniper and Cyphort, I have been responsible for the development of various different components of the ATP Appliance. I understand how the ATP Appliance operates and I am familiar with its source code.

3. I described the general operation of the ATP Appliance in my previous declaration. Dkt. No. 371-2 at ¶¶ 3-7 (incorporated herein by reference). Notably, ATP Appliance is a passive device that connects to a network to observe traffic and provides threat information to system administrators. The ATP Appliance does not do “in line” blocking, like the SRX; instead, ATP Appliance provides threat information to system administrators who then decide what action to take after the fact. ATP Appliance does not modify or “instrument” the files that it receives.

4. To use the ATP Appliance with an SRX, the following steps must be performed: (1) on the ATP Appliance, a customer must click the “SRX Enrollment URL” and copy the URL displayed, which points to a script and contains configuration information that is needed to complete the connection; (2) on the SRX, the customer must enter the URL obtained from the ATP Appliance into the CLI “OP URL” command; (3) the SRX will then download an executable (SLAX) script from that URL (which is not on the SRX when the SRX is originally shipped) and run the script; and (4) the script executes and completes the various configuration steps on both the SRX and ATP Appliance to enable the SRX to transmit information to the ATP Appliance and receive information back from the ATP Appliance.

5. I understand that Finjan attached the document bearing Bates JNPR-FNJNI_29040_01042912 through _01042914 as Exhibit 4 to its motion for summary judgment.

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Dkt. No. 368-12. This design document relates to a project that explored the use of Cyphort's malicious JavaScript detector in the SRX. The JavaScript detector is a standalone program that in theory could be run inside the SRX. However, this functionality was never implemented because testing showed that the program consumed too much memory for practical application.

6. The source code for the ATP Appliance is stored in a git repository that contains several sub-repositories. Each sub-repository also has different branches contained within it. These repositories and branches contain a variety of different source code. Some repositories and branches contain research and development code. Other repositories and branches contain the code for particular releases of ATP Appliance.

7. The [REDACTED] sub-repository stores research code that is developed as part of our research lab. It does not reflect the code of a released product.

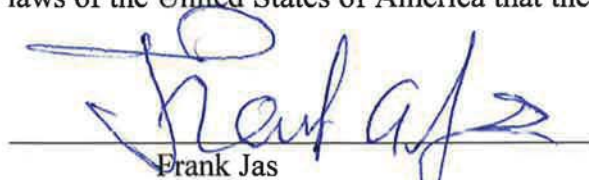
8. The [REDACTED] repository houses additional development code that has never been deployed, but also contains release branches of code that reflect the source code for the actual releases of the ATP Appliance product. For example, the [REDACTED] contained in the [REDACTED] repository does not reflect the source code for any released version of the product.

9. When one looks at the git repository on a computer, one can easily identify the branches within the [REDACTED] repository that contain the code for particular ATP Appliance releases. The release code branches are clearly delineated in the repository by denoting them as, for example, [REDACTED] as shown in the screenshot below:



Executed this 13 th day of March, 2019, at Sunnyvale, CA.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


Frank Jas