

# Exhibit I

HIGHLY CONFIDENTIAL SOURCE CODE - ATTORNEYS' EYES ONLY

Transcript of Raju Manthena

1 (1 to 4)

Conducted on May 30, 2018

<p>1 UNITED STATES DISTRICT COURT</p> <p>2 NORTHERN DISTRICT OF CALIFORNIA</p> <p>3 SAN FRANCISCO DIVISION</p> <p>4 -----x</p> <p>5 FINJAN, INC., a Delaware : Case No.</p> <p>6 Corporation, : 3:17-cv-05659-WHA</p> <p>7 Plaintiff, :</p> <p>8 v. :</p> <p>9 JUNIPER NETWORKS, INC., a :</p> <p>10 Delaware Corporation, :</p> <p>11 Defendant. :</p> <p>12 -----x</p> <p>13</p> <p>14</p> <p>15 HIGHLY CONFIDENTIAL SOURCE CODE - ATTORNEYS' EYES ONLY</p> <p>16</p> <p>17 VIDEOTAPED DEPOSITION OF RAJU MANTHENA</p> <p>18 Sunnyvale, California</p> <p>19 Wednesday, May 30, 2018</p> <p>20 9:02 a.m.</p> <p>21</p> <p>22</p> <p>23 Job No.: 191865</p> <p>24 Pages: 1 - 216</p> <p>25 Reported By: Charlotte Lacey, RPR, CSR No. 14224</p>	<p>3</p> <p>1 A P P E A R A N C E S</p> <p>2 ON BEHALF OF PLAINTIFF FINJAN, INC.:</p> <p>3 KRISTOPHER B. KASTENS, ESQUIRE</p> <p>4 SHANKER NAIR, ESQUIRE</p> <p>5 KRAMER LEVIN NAFTALIS &amp; FRANKEL LLP</p> <p>6 990 Marsh Road</p> <p>7 Menlo Park, California 94025</p> <p>8 (650) 752-1700</p> <p>9</p> <p>10 ON BEHALF OF DEFENDANT JUNIPER NETWORKS, INC.:</p> <p>11 REBECCA CARSON, ESQUIRE</p> <p>12 IRELL &amp; MANELLA LLP</p> <p>13 840 Newport Center Drive, Suite 400</p> <p>14 Newport Beach, California 92660</p> <p>15 (949) 760-0991</p> <p>16</p> <p>17 ALSO PRESENT:</p> <p>18 John Torreano, Videographer</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>2</p> <p>1 VIDEOTAPED DEPOSITION OF RAJU MANTHENA, held at the</p> <p>2 offices of Juniper Networks, Incorporated,</p> <p>3 1133 Innovation Way, Building A, Sunnyvale, California</p> <p>4</p> <p>5</p> <p>6</p> <p>7 Pursuant to notice, before Charlotte Lacey,</p> <p>8 Certified Shorthand Reporter, in and for the State of</p> <p>9 California.</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>4</p> <p>1 I N D E X</p> <p>2 WITNESS PAGE</p> <p>3 RAJU MANTHENA</p> <p>4 Examination by Mr. Kastens 7</p> <p>5</p> <p>6</p> <p>7 I N D E X O F E X H I B I T S</p> <p>8 EXHIBITS DESCRIPTION PAGE</p> <p>9 Exhibit 31 JWAS IP and HTTP cookie feed based 105</p> <p>10 Policy Enforcement on SRX Software</p> <p>11 Functional Specification, Bates</p> <p>12 number JNPR-FNJJN_29014_00197203</p> <p>13 Exhibit 32 Argon SRX Architecture Version 0.6, 113</p> <p>14 Bates number</p> <p>15 JNPR-FNJJN_29032_00590553</p> <p>16 Exhibit 33 Reputation Adapter File Hash Lookup, 143</p> <p>17 Bates number</p> <p>18 JNPR-FNJJN_29017_00553144</p> <p>19 Exhibit 34 Command and Control Prevention with 148</p> <p>20 Secintel Software Functional</p> <p>21 Specification, Bates number</p> <p>22 JNPR-FNJJN_29002_00173383</p> <p>23 Exhibit 35 SRX Space, Bates number 150</p> <p>24 JNPR-FNJJN_290717_00552579</p> <p>25 Exhibit 36 SRX Series Services Gateways for the 167</p>

<p>17</p> <p>1 A Okay. In general, yes. In general, this</p> <p>2 virtual product is equal to.</p> <p>3 Q Can the SRX --</p> <p>4 A Yeah, but I just want to make sure that --</p> <p>5 there are -- a virtual environment requires a</p> <p>6 different -- you know, a custom environment is needed.</p> <p>7 THE REPORTER: Can you repeat, please. I'm --</p> <p>8 A So the virtual products require a different</p> <p>9 platform environment.</p> <p>10 THE REPORTER: Thank you.</p> <p>11 Q Can the SRX Gateway scan for malware locally</p> <p>12 on the -- on the system?</p> <p>13 MS. CARSON: Objection; form.</p> <p>14 A We don't use the term "scan." Could you help</p> <p>15 me understand or elaborate with a specific --</p> <p>16 Q Yeah.</p> <p>17 A -- example of what the scan means?</p> <p>18 Q Does the SRX -- do the SRX Gateways have the</p> <p>19 capability to scan files that are seen on the network</p> <p>20 for viruses or malware?</p> <p>21 MS. CARSON: Objection; form.</p> <p>22 A No. SRX doesn't do any file analysis on the</p> <p>23 box -- on the SRX platform.</p> <p>24 Q Can the SRX Gateways have antivirus software</p> <p>25 installed on them?</p>	<p>19</p> <p>1 early software releases that was -- yeah -- that were</p> <p>2 running the AV that you mentioned.</p> <p>3 Q Are you aware of a term uniform -- or sorry</p> <p>4 UTM?</p> <p>5 A Yeah.</p> <p>6 Q And do you know what UTM stands for?</p> <p>7 A Unified threat management.</p> <p>8 Q And are you aware of how -- if there's a</p> <p>9 functionality related to the SRX Gateways that's</p> <p>10 referred to do as UTM?</p> <p>11 A Yeah. So UTM offers features such as AV</p> <p>12 integration and URL filtering.</p> <p>13 THE REPORTER: I'm sorry. "URL"...</p> <p>14 A It's called URL filtering.</p> <p>15 THE REPORTER: "Filtering"?</p> <p>16 A Yes.</p> <p>17 Q And how is the UTM sold?</p> <p>18 MS. CARSON: Objection; form.</p> <p>19 A I don't have definite information on that. I</p> <p>20 think it's better to contact PLM or sales.</p> <p>21 Q Is it like a software package you add to an</p> <p>22 SRX Gateway? Or is it a separate appliance?</p> <p>23 Just, like, what form would a customer acquire</p> <p>24 UTM?</p> <p>25 MS. CARSON: Objection; form.</p>
<p>18</p> <p>1 MS. CARSON: Objection; form.</p> <p>2 A So there is an AV, but it's -- it's not part</p> <p>3 of the Juniper developer software. We integrate with</p> <p>4 third-party company.</p> <p>5 Q What AV is currently offered on the SRX</p> <p>6 appliances?</p> <p>7 A It's called Sophos AV.</p> <p>8 Q Any other AV engines that are currently</p> <p>9 offered on the SRX Gateways?</p> <p>10 A Not that -- I don't know. Not that I know of.</p> <p>11 Q Do you know if any other antivirus packages</p> <p>12 were previously offered on the SRX Gateways?</p> <p>13 MS. CARSON: Objection; form.</p> <p>14 A No, I don't know.</p> <p>15 Q Are you aware if something called Express AV</p> <p>16 was previously offered on the SRX Gateways?</p> <p>17 A I don't have a lot of good information on that</p> <p>18 one because I haven't worked on that product.</p> <p>19 Q What is your level of understanding of Express</p> <p>20 AV?</p> <p>21 A I have -- I don't have any understanding on</p> <p>22 Express AV.</p> <p>23 Q Are you aware Kaspersky was offered as a</p> <p>24 antivirus solution on the SRX Gateways?</p> <p>25 A I don't have a lot of good information on the</p>	<p>20</p> <p>1 A It's -- it's a software package that -- that</p> <p>2 gets installed on the SRX operating system. That's</p> <p>3 Junos.</p> <p>4 But the Sophos AV that I -- just to clarify,</p> <p>5 the Sophos AV that I know of, it's a cloud-based</p> <p>6 service. It's the -- when I talk about the third-party</p> <p>7 software labeling, that's only to enable communication</p> <p>8 between SRX and then the actual Sophos cloud.</p> <p>9 Q So the SRX Gateway with the Sophos AV doesn't</p> <p>10 do scanning on the box. So just sends information up to</p> <p>11 the -- Sophos cloud; is that correct?</p> <p>12 MS. CARSON: Objection; form.</p> <p>13 A So that's right. That's right. It doesn't do</p> <p>14 any file analysis on the SRX box.</p> <p>15 Q Does it extract files?</p> <p>16 MS. CARSON: Objection; form.</p> <p>17 A The Junos software extracts the file content</p> <p>18 and hands it off to the third party, literally.</p> <p>19 Q Do you know if the file is sent to Sophos?</p> <p>20 MS. CARSON: Objection; form.</p> <p>21 A I'm not aware of that. So I haven't worked</p> <p>22 deeply on that particular product. I'd have to consult</p> <p>23 the code or the team that actually worked on the</p> <p>24 product.</p> <p>25 Q And how -- how does Junos extract the file</p>