

EXHIBIT B

REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

From: Kastens, Kris

Sent: Wednesday, March 6, 2019 3:01 PM

To: 'Glucoft, Josh' <JGlucoft@irell.com>

Cc: Andre, Paul <PAudre@KRAMERLEVIN.com>; Caire, Yuridia <YCaire@KRAMERLEVIN.com>; Hannah, James <JHannah@KRAMERLEVIN.com>; Hedvat, Shannon H. <SHedvat@KRAMERLEVIN.com>; Kobialka, Lisa <LKobialka@KRAMERLEVIN.com>; Lee, Hannah <HLee@KRAMERLEVIN.com>; Lee, Michael H. <MHLee@KRAMERLEVIN.com>; Manes, Austin <AManes@KRAMERLEVIN.com>; Martinez, Cristina <CMartinez@KRAMERLEVIN.com>; Nguyen, Stephanie <SNguyen@KRAMERLEVIN.com>; Xu, Linda <LXu@KRAMERLEVIN.com>; Carson, Rebecca <RCarson@irell.com>; Curran, Casey <ccurran@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>; Theilacker, Leah <LTheilacker@irell.com>; Wang, Kevin <kwang@irell.com>

Subject: RE: Meet and confer / Mitzenmacher Deposition

Josh,

Finjan requests that we also meet and confer regarding Juniper's late production of documents about [REDACTED]. In particular, Juniper did not produce documents showing [REDACTED] until February 4, 2019, despite the fact that these documents were requested a year ago. [REDACTED]

I am available to meet and confer on both topics on Friday at 11AM.

Sincerely,
Kris

From: Glucoft, Josh <JGlucoft@irell.com>

Sent: Wednesday, March 6, 2019 9:42 AM

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

Cc: Andre, Paul <PAudre@KRAMERLEVIN.com>; Caire, Yuridia <YCaire@KRAMERLEVIN.com>; Hannah, James <JHannah@KRAMERLEVIN.com>; Hedvat, Shannon H. <SHedvat@KRAMERLEVIN.com>; Kobialka, Lisa <LKobialka@KRAMERLEVIN.com>; Lee, Hannah <HLee@KRAMERLEVIN.com>; Lee, Michael H. <MHLee@KRAMERLEVIN.com>; Manes, Austin <AManes@KRAMERLEVIN.com>; Martinez, Cristina

<CMartinez@KRAMERLEVIN.com>; Nguyen, Stephanie <SNguyen@KRAMERLEVIN.com>; Xu, Linda <LXu@KRAMERLEVIN.com>; Carson, Rebecca <RCarson@irell.com>; Curran, Casey <ccurran@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>; Theilacker, Leah <LTheilacker@irell.com>; Wang, Kevin <kwang@irell.com>; #Juniper/Finjan [Int] <Juniper-Finjan@irell.com>

Subject: [EXTERNAL] RE: Meet and confer / Mitzenmacher Deposition

Kris,

Finjan's motion for summary judgment improperly presents at least the following new theories that were not disclosed in Finjan's infringement contentions:

- "Http" as the claimed "first function"
- The "verdict engine" and "chain heuristics" as the claimed "security computers"
- "Whitelisting," starting/stopping file sample analysis, marking an object as "clean," and moving an object to "END" state as the claimed "second function"
- [REDACTED]
- Transmitting a verdict that is independent of the client computer's security policy as infringing under the doctrine of equivalents

Please provide times on Thursday that you are available to confer about these new theories.

Best,
Josh

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

Sent: Tuesday, March 5, 2019 11:34 AM

To: Glucoft, Josh <JGlucoft@irell.com>

Cc: ~Andre, Paul <pandre@kramerlevin.com>; ~Caire, Yuridia <ycaire@kramerlevin.com>; ~Hannah, James <jhannah@kramerlevin.com>; ~Hedvat, Shannon <shedvat@kramerlevin.com>; ~Kobialka, Lisa <lkobialka@kramerlevin.com>; ~Lee, Hannah <hlee@kramerlevin.com>; ~Lee, Michael <mhlee@kramerlevin.com>; ~Manes, Austin <amanes@kramerlevin.com>; ~Martinez, Cristina <cmartinez@kramerlevin.com>; ~Nguyen, Stephanie <SNguyen@KRAMERLEVIN.com>; ~Xu, Linjun <lxu@kramerlevin.com>; Carson, Rebecca <RCarson@irell.com>; Curran, Casey <ccurran@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>; Theilacker, Leah <LTheilacker@irell.com>; Wang, Kevin <kwang@irell.com>

Subject: RE: Meet and confer / Mitzenmacher Deposition

Josh,
Your response doesn't provide any information. What are you going to say during the meet and confer isn't disclosed? I can't prepare for our call until I have this information. I'm not available anymore tomorrow, but I should be able to provide times within 1-2 days of you providing the contentions you allege are not disclosed.
- Kris

Kris Kastens
Partner

Kramer Levin Neffell & Frankel LLP

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From: Glucoft, Josh <JGlucoft@irell.com>

Sent: Tuesday, March 5, 2019 10:44 AM

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

Cc: Andre, Paul <PAndre@KRAMERLEVIN.com>; Caire, Yuridia <YCaire@KRAMERLEVIN.com>; Hannah, James

<JHannah@KRAMERLEVIN.com>; Hedvat, Shannon H. <SHedvat@KRAMERLEVIN.com>; Kobiarka, Lisa

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<JKagan@irell.com>; Manzano, Jim <JManzano@irell.com>; Petersen, Ingrid <ipetersen@irell.com>; Quarnstrom, Brian

<BQuarnstrom@irell.com>; Theilacker, Leah <LTheilacker@irell.com>; Wang, Kevin <kwang@irell.com>; #Juniper/Finjan

[Int] <Juniper-Finjan@irell.com>

Subject: [EXTERNAL] Re: Meet and confer / Mitzenmacher Deposition

Kris,

Finjan's motion for summary judgment presents a large number of new theories, including identifying new components as comprising the claimed "content processor" and "security computer." I will call you at 2 pm Pacific tomorrow (Wednesday) to confer.

Thanks,

Josh

On Mar 3, 2019, at 7:12 PM, Kastens, Kris <KKastens@kramerlevin.com> wrote:

Josh,

Identify the infringement scenarios that you contend that were not previously disclosed so that we can have a meaningful meet and confer. We are not available on Monday, but should be able to meet and confer on Wednesday.

Also, we have additional details regarding the deposition tomorrow. The deposition will most likely start late as a result of the anticipated snow tonight but should begin by 9:30AM-10:00AM. Furthermore, the deposition will be held on the 5th floor in the Forest Hills room.

Sincerely,
Kris

Kris Kastens

Partner

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Bio

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From: Glucoft, Josh <JGlucoft@irell.com>

Sent: Friday, March 1, 2019 11:02 AM

To: Andre, Paul <PAAndre@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 <AManes@KRAMERLEVIN.com>; Martinez, Cristina <CMartinez@KRAMERLEVIN.com>; Nguyen, Stephanie <SNguyen@KRAMERLEVIN.com>; Xu, Linda <LXu@KRAMERLEVIN.com>

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Subject: [EXTERNAL] Meet and confer

Counsel,

Finjan's motion for summary judgment improperly presents new theories not previously disclosed in Finjan's infringement contentions. Please provide times on Monday that Finjan is available to confer about these new theories.

Best,
Josh

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

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