

EXHIBIT B

HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY
JOHN GARLAND - 11/02/2018

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FINJAN, INC., a Delaware)
Corporation,) Case No.
Plaintiff,) 3:17-cv-05659-WHA
vs.)
JUNIPER NETWORKS, INC., a)
Delaware Corporation,)
Defendant.) (Pages 1-326)
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THIS TRANSCRIPT IS DEEMED
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OUTSIDE ATTORNEYS' EYES ONLY

REPORTER'S TRANSCRIPTION
OF THE VIDEOTAPED DEPOSITION OF
JOHN GARLAND
FRIDAY, NOVEMBER 2, 2018

TRANSCRIBED BY:
SUSAN NELSON
C.S.R. No. 3202

1 with notice that advanced security modules that use 16:58:39
2 security profiles infringe the '494 patent in 16:58:46
3 Finjan's view? 16:58:50

4 MR. KASTENS: Objection. Form. 16:58:51

5 THE WITNESS: I believe so. 16:59:10

6 BY MR. KAGAN: 16:59:11

7 Q. Okay. But you never mentioned security 16:59:11
8 profiles at all during the phone call. 16:59:14

9 Is that correct? 16:59:16

10 MR. KASTENS: Objection. Form. 16:59:16

11 THE WITNESS: I don't mention the security 16:59:17
12 profiles, but -- and Juniper had announced an 16:59:24

13 advanced malware subscription service -- it's called 16:59:32
14 Sky ATP -- in September. And we had analyzed that. 16:59:35

15 BY MR. KAGAN: 16:59:41

16 Q. You never mentioned security profiles on the 16:59:41
17 call. Is that correct? 16:59:46

18 A. I did not, yes. 16:59:47

19 Q. You never mentioned Sky ATP on the call. 16:59:47

20 Is that correct? 16:59:52

21 MR. KASTENS: Objection. Form. 16:59:52

22 THE WITNESS: I don't mention Sky ATP. 16:59:52

23 BY MR. KAGAN: 16:59:55

24 Q. Okay. Do you believe on the call you 17:00:06
25 provided notice that Juniper's UTM module infringes 17:00:07