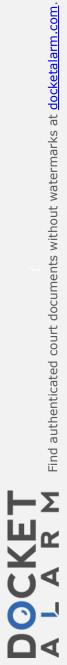
EXHIBIT 16



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Volume 4 Pages 615 - 831 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA BEFORE THE HONORABLE WILLIAM H. ALSUP, JUDGE FINJAN, INC., Plaintiff, VS. No. c 17-5659 WHA JUNIPER NETWORKS, INC., Defendant. San Francisco, California Thursday, December 13, 2018	APPEARANCES (CONTINUED): For Defendant: IRELL & MANELLA LLP 1800 Avenue of the Stars, Suite 900 Los Angeles, California 90067-4276 BY: JONATHAN S. KAGAN, ESQ. ALAN J. HEINRICH, ESQ. JOSHUA GLUCOFT, ESQ. CASEY CURRAN, ESQ. IRELL & MANELLA LLP 840 Newport Center Drive, Suite 400 Newport Beach, California 92660 BY: REBECCA CARSON, ESQ. KEVIN X. WANG, ESQ.
TRANSCRIPT OF PROCEEDINGS	
APPEARANCES: For Plaintiff: KRAMER, LEVIN, NAFTALIS & FRANKEL LLP 990 Marsh Road Menlo Park, California 94025 BY: PAUL J. ANDRE, ESQ. LISA KOBTALKA, ESQ. JAMES HANNAH, ESQ. KRISTOPHER B. KASTENS, ESQ. KRAMER LEVIN NAFTALIS AND FRANKEL LLP 1177 Avenue of the Americas New York, New York 10036 BY: CRISTINA LYNN MARTINEZ, ESQ. (Appearances continued on next page) Reported By: Katherine Powell Sullivan, CSR No. 5812, RMR, CRR JO ANN Bryce, CSR No. 3321, RMR, CRR Official Reporters	

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	1	these tables are generated there's a separate table that 739	1	by sending one number, and so the table that contains the 740
	2	just contains some bookkeeping information and a verdict and no	2	verdicts is consulted. There's a lookup in that table. It's a
	3	suspicious operations. They have separate names and they're in		very fast process. That is return it returns an integer and
	4	separate tables in DynamoDB.	4	that is sent to the SRX.
	5	THE COURT: Wait a minute. Don't say anything for a		THE COURT: Wait. Wait. But the Claim 10 doesn't
	6	second.	6	require it doesn't let me put it differently it
	7	(Pause in proceedings.)	7	doesn't address what gets sent back to SRX. Claim 10 ends with
	8	THE COURT: All right. For now I'll hold my further	8	the security profile data being put into a database. So what
	8 9		9	difference does it make what gets sent to the SRX? Claim 10
		questions. Thank you. Go ahead.	10	doesn't address that.
	10			
	11	BY MR. HEINRICH:	11	THE WITNESS: So, Your Honor, let me explain why I'm
	12	Q. And just a few clarifications here. So does the verdict	12	making this point.
	13	contain or include a list of suspicious computer operations?	13	Dr. Cole claimed that there was this huge efficiency gain
	14	A. It's a simple number. It doesn't contain anything except	14	that Juniper was getting by being able to query a database very
	15	that number.	15	quickly, and that would allow the list of suspicious operations
	16	Q. Now, you mentioned there are these two tables. When a	16	to be retrieved very quickly, and he used those words.
	17	request goes up to Sky ATP and the file is already seen, which	17	And I am countering that by saying that that is not a
	18	one of those two tables that you mentioned is consulted?	18	requirement of the system. It doesn't need to retrieve the
	19	A. It only looks at the table that contains the verdicts, and	19	list of suspicious operations very quickly like he said it does
	20	there's a really good reason for that. The Sky the SRX	20	because you only need to get a verdict.
	21	device doesn't need to know what to do with suspicious	21	THE COURT: All right. Well, that may you may
	22	operations. The list of suspicious operations is huge. It	22	differ with him on that point, but I have a different question,
	23	would create a tremendous amount of overhead to try to send	23	which was: Does Claim 10 in your view even address what gets
	24	that down to the SRX.	24	sent down to the SRX?
	25	And everything that needs to be done can be accomplished	25	THE WITNESS: It does not.
-				
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	1	THE COURT: It does not. Okay. Thank you. 741	1	Q. Now, what does it mean to be organized according to a ⁷⁴²
	1 2	THE COURT: It does not. Okay. Thank you. ⁷⁴¹ Go ahead.	1 2	Q. Now, what does it mean to be organized according to a ^{/42} database schema?
		Go ahead. BY MR. HEINRICH:		Q. Now, what does it mean to be organized according to a
	2	Go ahead.	2	Q. Now, what does it mean to be organized according to a database schema?
	2 3	Go ahead. BY MR. HEINRICH:	2 3	Q. Now, what does it mean to be organized according to a database schema?A. So a database schema is a very specific thing. If you
	2 3	Go ahead.BY MR. HEINRICH:Q. So let's kind of tie this together now by getting right	2 3	 Q. Now, what does it mean to be organized according to a database schema? A. So a database schema is a very specific thing. If you have a database I want to give an example of a say you
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	1	with a schema you can create a query exactly like the one I 743	1	744 THE WITNESS: Let me try this without the microphone,
	2	just described and immediately it will spit out all the	2	and if anybody has any trouble hearing me, I'll pick it up.
	3	students that meet that. That's very powerful. Okay? And	3	Okay? The court reporter too. You'll hear me.
	4	that is why you have a schema in a database.	4	So first I'd like to describe a regular schema database
	5	Q. Now, are there also schema-less databases?	5	like the one that I just talked about, and it's going to have a
	6	A. Yes. So there's another type of database which is called	6	very specific structure. Let's say we have a student ID, age,
	7	schema-less. It doesn't have the properties that I just showed	7	gender, and GPA. It doesn't really matter what these fields
	8	you.	8	are. I'm just giving an example.
	9	Q. What's the difference between a database with a schema and		So we have these fields over here. Oh, I forgot the name
	10	a schema-less database?	10	but it doesn't matter. We have all of the fields that you
	11	A. Your Honor, I would like to be able to show them that	11	would need for this example.
	12	with	12	And let's say that the university or high school, whatever
	13	THE COURT: Please.	13	the school is, starts entering the students into it. So the ID
	14	(Pause in proceedings.)	13	might be 12, the age might be 18, gender male, and GPA 3.8,
	15	THE COURT: Why don't you put it closer to the jury	15	good student. Okay?
	16	box.	16	And we can imagine that this database is very, very big,
	17	MR. KAGAN: Over there, Your Honor?	17	but it can't have any information other than these things. If
	18	THE COURT: No. I'm going to come around where my law		it did, then the schema would break. So if you tell me, "Okay.
	19	clerk is and look so just you need to face the jury.	10	I want you to enter for student number 12 their country of
	20	All right. So where is our witness? Oh, there he is.	20	origin?", I say, "Well, this database doesn't support that
	20	All right. So go ahead and keep your voice up	20	feature." Okay?
	21	MR. ANDRE: Your Honor, may I stand where I can see it		This is a type of database called a schema database. This
	23	also?	23	is the only database that is in question in Claim 10 because
	24	THE COURT: Of course.	23	Claim 10 is defined, agreed to by the parties, as being a
	25	MR. ANDRE: Actually, if it's there, I'm fine here.	25	database that has a database schema.
_		<i>y</i> ,		
		RUBIN - DIRECT / HEINRICH		RUBIN - DIRECT / HEINRICH
	1	RUBIN - DIRECT / HEINRICH	1	RUBIN - DIRECT / HEINRICH that I had many jought mut in mut calcume database into a 746
	1	745 Now, there's another class of databases called schema-less	1	that I had previously put in my schema database into a 746
	1 2 2	745 Now, there's another class of databases called schema-less databases. One of my primary disagreements with Dr. Cole was	2	that I had previously put in my schema database into a schema-less database. I can do that but now you ask me "Okay.
	3	745 Now, there's another class of databases called schema-less databases. One of my primary disagreements with Dr. Cole was his definition of a schema-less database, which I believe is	2 3	that I had previously put in my schema database into a schema-less database. I can do that but now you ask me, "Okay. Student 12 is from Germany. Can you put that in the database?"
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