

1 IRELL & MANELLA LLP
Jonathan S. Kagan (SBN 166039)
2 jkagan@irell.com
Alan Heinrich (SBN 212782)
3 aheinrich@irell.com
Joshua Glucoft (SBN 301249)
4 jglucoft@irell.com
1800 Avenue of the Stars, Suite 900
5 Los Angeles, California 90067-4276
Telephone: (310) 277-1010
6 Facsimile: (310) 203-7199

7 Rebecca Carson (SBN 254105)
rcarson@irell.com
8 Kevin Wang (SBN 318024)
kwang@irell.com
9 Ingrid M. H. Petersen (SBN 313927)
ipetersen@irell.com
10 840 Newport Center Drive, Suite 400
Newport Beach, California 92660-6324
11 Telephone: (949) 760-0991
Facsimile: (949) 760-5200

12 *Attorneys for Defendant*
13 JUNIPER NETWORKS, INC.

14
15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 FINJAN, INC., a Delaware Corporation,) Case No. 3:17-cv-05659-WHA
19 Plaintiff,)
20 vs.) **DECLARATION OF JOSHUA GLUCOFT**
21 JUNIPER NETWORKS, INC., a Delaware) **IN SUPPORT OF DEFENDANT JUNIPER**
22 Corporation,) **NETWORKS, INC.’S REPLY IN**
23 Defendant.) **SUPPORT OF MOTION TO STRIKE**
24) **UNDISCLOSED THEORIES FROM**
25) **PLAINTIFF FINJAN, INC.’S MOTION**
26) **FOR SUMMARY JUDGMENT**
27) Date: May 2, 2019
28) Time: 8:00 a.m.
) Courtroom: Courtroom 12, 19th Floor
) Before: Hon. William Alsup

DECLARATION OF JOSHUA GLUCOFT

I, Joshua Glucoft, declare as follows:

1. I am a member in good standing of the State Bar of California and an associate at Irell & Manella LLP, counsel of record in this action for Defendant Juniper Networks, Inc. (“Juniper”). 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. I make this declaration in support of Juniper’s Reply in Support of Its Motion to Strike New Theories from Plaintiff Finjan, Inc.’s (“Finjan”) Motion for Summary Judgment.

2. Attached hereto as Exhibit 1 is a true and correct copy of an email dated April 1, 2019 from that I sent to counsel for Finjan.

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of Juniper’s First Supplemental Response to Finjan’s First Set of Requests for Production, served on June 18, 2018.

4. The last-produced document cited by Finjan in its motion for summary judgment is JNPR-FNJNI_29040_01194632. See Dkt. No. 368-6 at ¶ 67.¹ This document was produced to Finjan on November 6, 2018.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. Executed this 4th day of April, 2019 at Los Angeles, California.

By: /s/ Joshua Glucoft
Joshua Glucoft (SBN 301249)

¹ All other documents cited by Finjan in its motion for summary judgment have smaller Bates numbers, as indicated by the number in the last eight digits of Juniper’s Bates stamp, which was assigned sequentially. In other words, all documents cited by Finjan with a Bates stamp ending in a number less than 01194632 were produced on or before November 6, 2018.