

EXHIBIT 1

From: Glucoft, Josh
Sent: Monday, April 1, 2019 4:38 PM
To: ~Kastens, Kristopher; ~Andre, Paul; ~Caire, Yuridia; ~Hannah, James; ~Hedvat, Shannon; ~Kobialka, Lisa; ~Lee, Hannah; ~Lee, Michael; ~Manes, Austin; ~Martinez, Cristina; ~Nguyen, Stephanie; ~Xu, Linjun
Cc: Kagan, Jonathan; Carson, Rebecca; Petersen, Ingrid; Wang, Kevin; #Juniper/Finjan [Int]
Subject: RE: Deposition

Kris,

We understand that you refuse to make Dr. Medvidovic available for deposition before our reply is due this Thursday, April 4, notwithstanding your reliance on his declaration in your opposition to our motion to strike. Your proposal to extend the deadline for Juniper's reply until May 3 does not work because the motion is noticed to be heard on May 2, and it must be heard at the same time the Court hears argument on summary judgment because the issues are inextricably related. Please let us know immediately if Finjan will reconsider and make Dr. Medvidovic available this week for deposition.

Thanks,
Josh

From: Kastens, Kris <KKastens@KRAMERLEVIN.com>
Sent: Monday, April 1, 2019 11:40 AM
To: Glucoft, Josh <JGlucoft@irell.com>; ~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>
Cc: Kagan, Jonathan <JKagan@irell.com>; Carson, Rebecca <RCarson@irell.com>; Petersen, Ingrid <ipetersen@irell.com>; Wang, Kevin <kwang@irell.com>
Subject: RE: Deposition

Josh,

While a deposition of Dr. Medvidovic for his short declaration is unnecessary and we are unaware of any law requiring a deposition under these circumstances for Juniper's flawed motion to strike, we have asked for his availability. Dr. Medvidovic is available on April 30th in LA for a two hour deposition limited exclusively to the material in his short declaration. He is unavailable before that time, due to other commitments, including because he will be out of the country. Finjan agrees to stipulate to adjust the schedule so that Juniper does not need to file its reply until two days after Dr. Medvidovic is deposed (May 3rd).

Sincerely,
Kris

Kris Kastens

Partner

Kramer Levin Naftalis & Frankel LLP
990 Marsh Road, Menlo Park, California 94025
T 650.752.1715 F 650.752.1815
kkastens@kramerlevin.com

Bio

This communication (including any attachments) is intended solely for the recipient(s) named above and may contain information that is confidential, privileged or legally protected. Any unauthorized use or dissemination of this communication is strictly prohibited. If you have received this communication in error, please immediately notify the sender by return e-mail message and delete all copies of the original communication. Thank you for your cooperation.

From: Glucoft, Josh <JGlucoft@irell.com>
Sent: Monday, April 1, 2019 9:12 AM
To: Andre, Paul <PAndre@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>
Cc: #Juniper/Finjan [Int] <Juniper-Finjan@irell.com>; Kagan, Jonathan <JKagan@irell.com>; Carson, Rebecca <RCarson@irell.com>; Petersen, Ingrid <ipetersen@irell.com>; Wang, Kevin <kwang@irell.com>
Subject: [EXTERNAL] RE: Deposition

Kris,

Please advise immediately regarding the below. Our reply is due this Thursday, and we must depose Dr. Medvidovic sufficiently in advance of our reply in order to be able to incorporate his deposition testimony.

Thanks,
Josh

-----Original Message-----

From: Glucoft, Josh <JGlucoft@irell.com>
Sent: Friday, March 29, 2019 8:49 PM
To: ~Kastens, Kristopher <kkastens@kramerlevin.com>; ~Andre, Paul <pandre@kramerlevin.com>; ~Hannah, James <jhannah@kramerlevin.com>; ~Kobialka, Lisa <lkobialka@kramerlevin.com>; ~Caire, Yuridia <ycaire@kramerlevin.com>; ~Manes, Austin <amanes@kramerlevin.com>; ~Lee, Michael <mhlee@kramerlevin.com>; ~Martinez, Cristina <cmartinez@kramerlevin.com>; ~Nguyen, Stephanie <SNguyen@KRAMERLEVIN.com>; Gladys Tong <GTong@KRAMERLEVIN.com>; Sarah Ackard <SAckard@KRAMERLEVIN.com>; Shauna Bender <SBender@KRAMERLEVIN.com>
Cc: #Juniper/Finjan [Int] <Juniper-Finjan@irell.com>; Kagan, Jonathan <JKagan@irell.com>; Carson, Rebecca <RCarson@irell.com>; Petersen, Ingrid <ipetersen@irell.com>; Wang, Kevin <kwang@irell.com>
Subject: Deposition

Kris,

Finjan relies on testimony from Dr. Medvidovic in support of its opposition to Juniper's motion to strike. Please provide dates early next week for Dr. Medvidovic's deposition so that Juniper has sufficient time to incorporate

Thanks,
Josh

PLEASE NOTE: This message, including any attachments, may include privileged, confidential and/or inside information. Any distribution or use of this communication by anyone other than the intended recipient(s) is strictly prohibited and may be unlawful. If you are not the intended recipient, please notify the sender by replying to this message and then delete it from your system. Thank you.