

EXHIBIT 2

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

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

17 FINJAN, INC., a Delaware Corporation,) Case No. 3:17-cv-05659-WHA
18)
18 Plaintiff,)
19)
19 vs.)
20)
20 JUNIPER NETWORKS, INC., a Delaware)
Corporation,)
21)
21 Defendant.)
22)
22 _____)

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1 Pursuant to Federal Rules of Civil Procedure 26 and 34, Defendant Juniper, Inc.
2 (“Juniper”) hereby submits the following first supplemented objections and responses
3 (collectively, the “First Supplemental Responses”) to the First Set of Requests for Production (the
4 “Requests”) by Defendant Finjan, Inc. (“Finjan”).

5 **PRELIMINARY STATEMENT**

6 Juniper has not completed discovery in this action and has not completed preparation for
7 trial. These First Supplemental Responses, while based on diligent inquiry and investigation by
8 Juniper, necessarily reflect only the current state of Juniper’s knowledge, understanding, and
9 belief based upon the information reasonably available to Juniper at this time. Juniper anticipates
10 that further facts and information may be discovered. Without in any way obligating itself to do
11 so, Juniper reserves the right to modify, supplement, revise, or amend these First Supplemental
12 Responses and to correct any errors or omissions which may be contained herein in light of the
13 information that Juniper may subsequently obtain or discover. Furthermore, these First
14 Supplemental Responses are provided without prejudice to Juniper’s use or reliance on, at trial,
15 hearing, or otherwise, subsequently discovered facts or information or facts or information omitted
16 from these responses. The following First Supplemental Responses are given without prejudice to
17 Juniper’s right to produce evidence of any subsequently discovered fact. Juniper accordingly
18 reserves the right to change any and all responses herein as additional facts are ascertained,
19 analyses are performed, legal research is completed, and contentions are investigated. This
20 introductory statement shall apply to each and every First Supplemental Response given herein
21 and shall be incorporated by reference as though set forth in each First Supplemental Response
22 appearing below.

23 Juniper’s production will be provided on a rolling basis phased to occur after disclosures
24 under Patent L.R. 3-4, pursuant to the parties’ agreement set forth in the stipulation regarding
25 discovery of ESI. Juniper’s technical production related to SRX, Sky ATP, and Space Security
26 Director is complete. Juniper has also made ATP Appliance’s source code available for review.
27 Juniper’s production related to ATP Appliance will be provided on a rolling basis starting in
28 June 2018.

1 DATED: June 18, 2018

IRELL & MANELLA LLP

2 By: /s/ Sharon Song
3 Sharon Song
4 *Attorneys for Defendant*
5 Juniper Networks, Inc.

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