

# EXHIBIT 2

IRELL & MANELLA LLP  
 Jonathan S. Kagan (SBN 166039)  
 jkagan@irell.com  
 Joshua Glucoft (SBN 301249)  
 jglucoft@irell.com  
 Casey Curran (SBN 305210)  
 ccurran@irell.com  
 Sharon Song (SBN 313535)  
 ssong@irell.com  
 1800 Avenue of the Stars, Suite 900  
 Los Angeles, California 90067-4276  
 Telephone: (310) 277-1010  
 Facsimile: (310) 203-7199

Rebecca Carson (SBN 254105)  
 rcarson@irell.com  
 Kevin Wang (SBN 318024)  
 kwang@irell.com  
 840 Newport Center Drive, Suite 400  
 Newport Beach, California 92660-6324  
 Telephone: (949) 760-0991  
 Facsimile: (949) 760-5200

*Attorneys for Defendant*  
 JUNIPER NETWORKS, INC.

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

FINJAN, INC., a Delaware Corporation,	)	Case No. 3:17-cv-05659-WHA
	)	
Plaintiff,	)	<b>DEFENDANT JUNIPER NETWORKS,</b>
	)	<b>INC.'S FIRST SUPPLEMENTAL</b>
vs.	)	<b>RESPONSE TO PLAINTIFF FINJAN,</b>
	)	<b>INC.'S FIRST SET OF REQUESTS FOR</b>
JUNIPER NETWORKS, INC., a Delaware	)	<b>PRODUCTION</b>
Corporation,	)	
	)	
Defendant.	)	

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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