

EXHIBIT 4

1 Juniper also objects to this Interrogatory on the grounds that it is overbroad, unduly
2 burdensome, oppressive, vague and ambiguous, not proportional to the needs of the case, and
3 seeks irrelevant information.

4 Juniper also specifically objects to this Interrogatory as seeking information that is not
5 proportional to the needs of the case to the extent it seeks information beyond “major” releases.
6 Juniper will respond to this Interrogatory only with respect to “major” releases and will not
7 provide information related to minor, beta, or testing revisions.

8 Subject to these specific objections and the general objections incorporated herein, Juniper
9 further responds as follows:

10 Pursuant to Fed. R. Civ. P. 33(d), Juniper directs Finjan to ATP Appliance’s source code,
11 which is currently available for review. Additional relevant, responsive, and non-privileged
12 documents related to the ATP Appliance will be produced on a rolling basis and Juniper will
13 supplement this response in due course.

14 **INTERROGATORY NO. 3:**

15 For the source code that You produced or made available for inspection or will produce
16 and make available for inspection, identify the products that correspond to the source code
17 including the name and version number of each product, the directories and subdirectories of the
18 source code corresponding to the active source code incorporated into each of the products, the
19 last date the source code was modified for each of the products, and which portion, if any, of the
20 code You contend is prior art to the Asserted Patents.

21 **RESPONSE TO INTERROGATORY NO. 3:**

22 Juniper incorporates herein by reference all General Objections set forth above.

23 Juniper also specifically objects to this Interrogatory because Finjan’s Interrogatories were
24 improperly served as set forth in the General Objections above. Juniper provides this specific
25 objection and response in an abundance of caution and in order to facilitate discovery, although
26 this Interrogatory is moot and no response is required.

27 Juniper also specifically objects to this Interrogatory to the extent that it seeks information
28 or documents that are subject to the attorney-client privilege, that evidence or constitute attorney

1 allowed or expedited until plaintiff successfully amends the complaint.”); *see also Richtek Tech.*
2 *Corp. v. uPi Semiconductor Corp.*, 2016 WL 1718135, at *2 (N.D. Cal. Apr. 29, 2016) (Alsup, J.).
3 Contrail is not alleged to infringe any Asserted Patent. Juniper interprets this Interrogatory as
4 excluding Advanced Threat Protection Appliance and Contrail. Juniper also specifically objects to
5 the definition of “Accused Instrumentalities” as including “all previous or currently contemplated
6 versions, revision, releases, or continuations of said Juniper products and services, and all
7 additional products accused of infringement by Finjan in this action in infringement contentions or
8 similar pleadings.” This definition is objectionable at least because it is overbroad and unduly
9 burdensome and may include instrumentalities released outside of the statutory damages period.
10 Juniper will interpret this Interrogatory as limited to only those instrumentalities properly
11 identified in both the operative complaint and Finjan’s infringement contentions and also made,
12 used, sold, offered for sale, or imported into the U.S. within the statutory damages period.

13 Juniper also specifically objects to this Interrogatory as compound. This Interrogatory
14 constitutes at least three distinct questions and will be treated as such with respect to limits on
15 interrogatories under Fed. R. Civ. P. 33(a).

16 Juniper also specifically objects to this Interrogatory as seeking discovery that is not
17 proportional to the needs of the case, considering the importance of the issues at stake in the
18 action, the amount in controversy, the parties’ relative access to relevant information, the parties’
19 resources, the importance of the discovery in resolving the issues, and whether the burden or
20 expense of the proposed discovery outweighs its likely benefit.

21 Juniper also objects to this Interrogatory on the grounds that it is overbroad, unduly
22 burdensome, oppressive, vague and ambiguous, not proportional to the needs of the case, and
23 seeks irrelevant information.

24 Subject to these specific objections and the general objections incorporated herein, Juniper
25 responds as follows:

26 Pursuant to Fed. R. Civ. P. 33(d), Juniper directs Finjan to the directory structure provided
27 on the secured review computer to identify the products corresponding to the source code by
28 product name and release and the directories and subdirectories of the source code corresponding

1 to the active source code incorporated into each of the products. The table below shows the
 2 versions of Junos corresponding to specific SRX Gateways. Sky ATP is regularly updated;
 3 pursuant to Fed. R. Civ. P. 33(d), Juniper directs Finjan to the Git log produced on the secured
 4 review computer showing the complete revision commit history of Sky ATP. At least the
 5 following versions of Space Security Director have been released in the U.S. since 2012: 17.2;
 6 17.1; 16.2; 16.1; 15.2; 15.1; 14.1; 13.3; 13.1; 12.2; 12.1.

7 Juniper also incorporates by reference its Invalidity Contentions served on April 23, 2018,
 8 which identifies prior art.

	Junos 12.1	Junos 12.1X44	Junos 12.1X45	Junos 12.1X46	Junos 12.1X47	Junos 12.3X48	Junos 15.1X49	Junos 17.3	Junos 17.4
Release Date	3/28/12	1/18/13	7/17/13	12/30/13	8/18/14	3/6/15	6/30/15	8/25/17	12/21/17
SRX110	✓	✓	✓	✓	✓	✓	×	×	×
SRX220	✓	✓	✓	✓	✓	✓	×	×	×
SRX3XX	×	×	×	×	×	×	✓	✓	✓
SRX550	N/A	✓	✓	✓	✓	✓	✓	✓	✓
SRX1400	✓	✓	✓	✓	✓	✓	×	×	×
SRX1500	×	×	×	×	×	×	✓	✓	✓
SRX3400	✓	✓	✓	✓	✓	✓	×	×	×
SRX3600	✓	✓	✓	✓	✓	✓	×	×	×
SRX4100	×	×	×	×	×	×	✓	✓	✓
SRX4200	×	×	×	×	×	×	✓	✓	✓
SRX5400	✓	✓	✓	✓	✓	✓	✓	✓	✓
SRX5600	✓	✓	✓	✓	✓	✓	✓	✓	✓
SRX5800	✓	✓	✓	✓	✓	✓	✓	✓	✓
vSRX	×	×	×	✓	✓	✓	✓	✓	✓
cSRX	×	×	×	×	×	×	×	×	×

24 DATED: June 18, 2018

IRELL & MANELLA LLP

25 By: /s/ Sharon Song
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 Attorneys for Defendant
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