DKT. 238-6 (REDACTED)

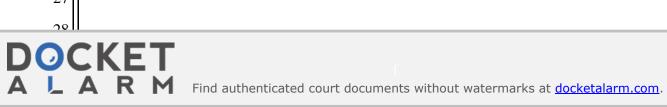


EXHIBIT 1

UNREDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED



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9		
10	FINJAN, INC.	
11	IN THE UNITED STATES DISTRICT COURT	
12	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
13	SAN FRANCISCO DIVISION	
14		
15	FINJAN, INC., a Delaware Corporation,	Case No.: 3:17-cv-05659-WHA
16	Plaintiff,	EXPERT REPORT OF DR. ERIC COLE
17	v.	HIGHLY CONFIDENTIAL – SOURCE CODE
18	HINDER NETWORKS INC. D.I.	
19	JUNIPER NETWORKS, INC., a Delaware Corporation,	
20	Defendant.	
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I, Eric Cole, hereby declare that:

1. I have been asked by Plaintiff Finjan, Inc. to submit an expert report on whether Juniper, Inc.'s SRX Gateways¹ and Sky ATP² products ("Accused Products") infringe claim 10 of U.S. Patent No. 8,677,494 (the "'494 Patent"). In particular, I have been asked to opine on whether the SRX Gateways and Sky ATP include a "database" as recited by the claim language. I understand that there was an order dated August 31, 2018 in which Finjan's summary judgment was granted in part in connection with the '494 Patent. August 31, 2018 Order. I relied on the documents cited herein, including the '494 Patent (and incorporated disclosures), the file history of the '494 Patent, the source code review computer, source code printouts, the deposition transcripts of Tenorio, Manthena, Nagarajan, and Manocha, as well as exhibits thereto, Finjan's Infringement Contentions, Juniper's Discovery Responses, and the summary judgment briefing, exhibits, and order related to the '494 Patent. I found that every element of the Claim 10 of the '494 Patent is met by the Accused Products.

I. EXPERIENCE AND QUALIFICATIONS

2. I hold a master's degree in computer science and a doctorate in information security and have worked in the cyber and technical information security industry for over 25 years. A copy of by CV is attached as Appendix A. I am a member of the European InfoSec Hall of Fame, a professional

¹ SRX Gateways includes all SRX Gateways that are capable of interacting with Sky ATP, and includes SRX100, SRX110, SRX210, SRX220, SRX240, SRX300, SRX340, SRX345, SRX550, SRX550m, SRX650, SRX1400, SRX1500, SRX3400, SRX3600, SRX4000, SRX4100, SRX4200, SRX5400, SRX5600, SRX5800, vSRX Virtual Firewall, vSRX (including 10Mbps, 100Mps, 1000Mbps, 2000Mbps, 4000Mbps version), Next Generation Firewall, cSRX Container Firewall. SRX Gateways include all supporting server or cloud infrastructure, feeds, and other components SRX Gateways utilize. ² Sky ATP includes the cloud infrastructure for Sky ATP, and includes the following service subscriptions Free Sky ATP, Basic Sky ATP (SRX340-THRTFEED-1, 3, 5; SRX345-THRTFEED-1, 3, 5; SRX550-THRTFEED-1, 3, 5; SRX1500-THRTFEED-1, 3, 5; SRX4100THRTFEED-1, 3, 5; SRX4200-THRTFEED-1, 3, 5; SRX5400-THRTFEED-1, 3, 5; SRX5600-THRTFEED-1, 3, 5; SRX5800-THRTFEED-1, 3, 5; VSRX10MTHRTFEED-1, 3, 5; VSRX100MTHRTFEED-1, 3, 5; VSRX1GTHRTFEED-1, 3, 5; VSRX2GTHRTFEED-1, 3, 5; and VSRX4GTHRTFEED-1, 3, 5) and Premium Sky ATP (SRX340-ATP-1, 3, 5; SRX345-ATP-1, 3, 5; SRX550-ATP-1, 3, 5; SRX1500-ATP-1, 3, 5; SRX4100-ATP-1, 3, 5; SRX4200-ATP-1, 3, 5; SRX5400-ATP-1, 3, 5; SRX5600-ATP-1, 3, 5; SRX5800-ATP-1, 3, 5; VSRX10M-ATP-1, 3, 5; VSRX100M-ATP-1, 3, 5; VSRX1G-ATP-1, 3, 5; VSRX2G-ATP-1, 3, 5; and VSRX4G-ATP-1, 3, 5). Sky ATP includes all supporting server or cloud infrastructure, feeds, and other components utilized by Sky ATP including Spotlight Secure Threat Intelligence Platform. Sky ATP also includes all products that receive updates from the service.



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A. Compensation

which are recognized as industry-standard sources.

3. My rate of compensation for my work in this case is \$475 per hour plus any direct expenses incurred. My compensation is based solely on the amount of time that I devote to activity related to this case and is in no way affected by any opinions that I render. I receive no other compensation from work on this action. My compensation is not dependent on the outcome of this case.

and served as a commissioner on cyber security for President Obama. My 8 books on cyber security

include "Network Security Bible - 2nd Edition," "Advanced Persistent Threat," and "Insider Threat,"

II. LEGAL STANDARDS

4. Counsel for Finjan has informed me of the following legal standards that I have used as



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