

EXHIBIT 7

HIGHLY CONFIDENTIAL SOURCE CODE - ATTORNEYS' EYES ONLY

Transcript of Raju Manthena

1 (1 to 4)

Conducted on May 30, 2018

<p>1 UNITED STATES DISTRICT COURT</p> <p>2 NORTHERN DISTRICT OF CALIFORNIA</p> <p>3 SAN FRANCISCO DIVISION</p> <p>4 -----x</p> <p>5 FINJAN, INC., a Delaware : Case No.</p> <p>6 Corporation, : 3:17-cv-05659-WHA</p> <p>7 Plaintiff, :</p> <p>8 v. :</p> <p>9 JUNIPER NETWORKS, INC., a :</p> <p>10 Delaware Corporation, :</p> <p>11 Defendant. :</p> <p>12 -----x</p> <p>13</p> <p>14</p> <p>15 HIGHLY CONFIDENTIAL SOURCE CODE - ATTORNEYS' EYES ONLY</p> <p>16</p> <p>17 VIDEOTAPED DEPOSITION OF RAJU MANTHENA</p> <p>18 Sunnyvale, California</p> <p>19 Wednesday, May 30, 2018</p> <p>20 9:02 a.m.</p> <p>21</p> <p>22</p> <p>23 Job No.: 191865</p> <p>24 Pages: 1 - 216</p> <p>25 Reported By: Charlotte Lacey, RPR, CSR No. 14224</p>	<p>3</p> <p>1 A P P E A R A N C E S</p> <p>2 ON BEHALF OF PLAINTIFF FINJAN, INC.:</p> <p>3 KRISTOPHER B. KASTENS, ESQUIRE</p> <p>4 SHANKER NAIR, ESQUIRE</p> <p>5 KRAMER LEVIN NAFTALIS & FRANKEL LLP</p> <p>6 990 Marsh Road</p> <p>7 Menlo Park, California 94025</p> <p>8 (650) 752-1700</p> <p>9</p> <p>10 ON BEHALF OF DEFENDANT JUNIPER NETWORKS, INC.:</p> <p>11 REBECCA CARSON, ESQUIRE</p> <p>12 IRELL & MANELLA LLP</p> <p>13 840 Newport Center Drive, Suite 400</p> <p>14 Newport Beach, California 92660</p> <p>15 (949) 760-0991</p> <p>16</p> <p>17 ALSO PRESENT:</p> <p>18 John Torreano, Videographer</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>2</p> <p>1 VIDEOTAPED DEPOSITION OF RAJU MANTHENA, held at the</p> <p>2 offices of Juniper Networks, Incorporated,</p> <p>3 1133 Innovation Way, Building A, Sunnyvale, California</p> <p>4</p> <p>5</p> <p>6</p> <p>7 Pursuant to notice, before Charlotte Lacey,</p> <p>8 Certified Shorthand Reporter, in and for the State of</p> <p>9 California.</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>4</p> <p>1 I N D E X</p> <p>2 WITNESS PAGE</p> <p>3 RAJU MANTHENA</p> <p>4 Examination by Mr. Kastens 7</p> <p>5</p> <p>6</p> <p>7 I N D E X O F E X H I B I T S</p> <p>8 EXHIBITS DESCRIPTION PAGE</p> <p>9 Exhibit 31 JWAS IP and HTTP cookie feed based 105</p> <p>10 Policy Enforcement on SRX Software</p> <p>11 Functional Specification, Bates</p> <p>12 number JNPR-FNJJN_29014_00197203</p> <p>13 Exhibit 32 Argon SRX Architecture Version 0.6, 113</p> <p>14 Bates number</p> <p>15 JNPR-FNJJN_29032_00590553</p> <p>16 Exhibit 33 Reputation Adapter File Hash Lookup, 143</p> <p>17 Bates number</p> <p>18 JNPR-FNJJN_29017_00553144</p> <p>19 Exhibit 34 Command and Control Prevention with 148</p> <p>20 Secintel Software Functional</p> <p>21 Specification, Bates number</p> <p>22 JNPR-FNJJN_29002_00173383</p> <p>23 Exhibit 35 SRX Space, Bates number 150</p> <p>24 JNPR-FNJJN_290717_00552579</p> <p>25 Exhibit 36 SRX Series Services Gateways for the 167</p>

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Transcript of Raju Manthana

2 (5 to 8)

Conducted on May 30, 2018

<p>5</p> <p>1 Branch, Bates Number</p> <p>2 FINJAN-JN 005221</p> <p>3 Exhibit 37 SRX Cloud Integration, Bates number 168</p> <p>4 JNPR-FNJJN_29017_00552968</p> <p>5 Exhibit 38 Junos OS UTM Feature Guide for 184</p> <p>6 Security Devices, Bates Number</p> <p>7 JNPR-FNJJN_29007_00016517</p> <p>8 Exhibit 39 Junos OS Intrusion Detection and 191</p> <p>9 Prevention Feature Guide for</p> <p>10 Security Devices, Bates number</p> <p>11 JNPR-FNJJN_29007_00011603</p> <p>12</p> <p>13</p> <p>14 PREVIOUSLY MARKED EXHIBITS</p> <p>15 EXHIBIT DESCRIPTION PAGE</p> <p>16 Exhibit 3 Sky ATP Sky Advance Threat Prevention 200</p> <p>17 Administration Guide, Bates number</p> <p>18 FINJAN-JN 044887</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>7</p> <p>1 Charlotte Lacey representing on behalf of Planet Depos.</p> <p>2 If there are no further stipulations or</p> <p>3 comments from counsel, will the court reporter please</p> <p>4 swear in the witness.</p> <p>5 RAJU MANTHANA,</p> <p>6 the witness herein, having been first duly sworn, was</p> <p>7 examined and testified as follows:</p> <p>8 THE VIDEOGRAPHER: Please proceed, Counsel.</p> <p>9 EXAMINATION</p> <p>10 BY MR. KASTENS:</p> <p>11 Q Who is your employer?</p> <p>12 A Juniper Networks.</p> <p>13 Q What is your position at Juniper Networks?</p> <p>14 A I'm a principal software engineer.</p> <p>15 Q What are your responsibilities as a principal</p> <p>16 software engineer?</p> <p>17 A I design, develop code products, primarily the</p> <p>18 SRX.</p> <p>19 Q Have you ever been deposed before?</p> <p>20 A No.</p> <p>21 Q Any reason you can't give accurate testimony</p> <p>22 today?</p> <p>23 A No.</p> <p>24 Q So since you haven't been deposed before, I'll</p> <p>25 just give a couple little ground rules that may help us</p>
<p>6</p> <p>1 PROCEEDINGS</p> <p>2 THE VIDEOGRAPHER: Good morning. We are now</p> <p>3 on the record. Here begins media number 1 in the</p> <p>4 videotaped deposition of Raju Manthana in the matter of</p> <p>5 Finjan, Incorporated, versus Juniper Networks,</p> <p>6 Incorporated, et al., held in the United States District</p> <p>7 Court in the Northern District of California,</p> <p>8 San Francisco Division, case number 3:17-cv-05659-WHA.</p> <p>9 Today's date is May 30th, 2018, and the time on the</p> <p>10 video monitor is 9:03 a.m.</p> <p>11 Your videographer today is John Torreano</p> <p>12 representing on behalf of Planet Depos. This -- this</p> <p>13 video deposition is taking place at Juniper Networks,</p> <p>14 Incorporated, 1133 Innovation Way, Building A, in</p> <p>15 Sunnyvale, California.</p> <p>16 Would counsel please voice identify themselves</p> <p>17 and state whom they represent in this action.</p> <p>18 MR. KASTENS: Kristopher Kastens here on</p> <p>19 behalf of Finjan, Inc., from Kramer Levin Naftalis &</p> <p>20 Frankel, and I have with me Shanker Nair, who is also</p> <p>21 from Kramer Levin Naftalis & Frankel, and here on behalf</p> <p>22 of Finjan, Inc.</p> <p>23 MS. CARSON: Rebecca Carson from Irell &</p> <p>24 Manella, on behalf of Juniper Networks, Inc.</p> <p>25 THE VIDEOGRAPHER: The court reporter today is</p>	<p>8</p> <p>1 along the way. Just when I ask a question, please wait</p> <p>2 until I finish the question before answering. Does that</p> <p>3 make sense?</p> <p>4 A Yes.</p> <p>5 Q And if -- if you have any -- strike that.</p> <p>6 From time to time, your counsel may object to</p> <p>7 some of my questions. You're still obligated to answer</p> <p>8 the questions to the extent you're able, unless your</p> <p>9 counsel advises you not to answer the question. Do you</p> <p>10 understand?</p> <p>11 A Okay.</p> <p>12 Q Did you -- did you do anything to prepare for</p> <p>13 this deposition?</p> <p>14 A No, other than the little information that I</p> <p>15 had.</p> <p>16 Q Did you meet with counsel in preparation of</p> <p>17 the deposition?</p> <p>18 A Yes.</p> <p>19 Q How long did you meet with counsel for?</p> <p>20 A A couple of hours yesterday.</p> <p>21 Q Did you review any documents in preparation of</p> <p>22 the deposition?</p> <p>23 A No.</p> <p>24 Q How long have you worked at Juniper?</p> <p>25 A It's 13 years.</p>