

# EXHIBIT 8

Transcript of Chandra Nagarajan

Conducted on May 31, 2018

<p style="text-align: center;">1</p> <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 HIGHLY CONFIDENTIAL SOURCE CODE - ATTORNEYS' EYES ONLY</p> <p>15</p> <p>16 VIDEOTAPED DEPOSITION OF CHANDRA NAGARAJAN</p> <p>17 Sunnyvale, California</p> <p>18 Thursday, May 31, 2018</p> <p>19 9:05 a.m.</p> <p>20</p> <p>21</p> <p>22</p> <p>23 Job No.: 189837</p> <p>24 Pages: 1 - 245</p> <p>25 Reported By: Charlotte Lacey, RPR, CSR No. 14224</p>	<p style="text-align: center;">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 MICHAEL H. LEE, ESQUIRE</p> <p>4 LINDA XU, ESQUIRE</p> <p>5 KRAMER LEVIN NAFTALIS &amp; 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 JONATHAN S. KAGAN, ESQUIRE</p> <p>12 IRELL &amp; MANELLA LLP</p> <p>13 1800 Avenue of the Stars, Suite 900</p> <p>14 Los Angeles, California 90067</p> <p>15 (301) 277-1010</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 style="text-align: center;">2</p> <p>1 VIDEOTAPED DEPOSITION OF CHANDRA NAGARAJAN, held at</p> <p>2 the 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 style="text-align: center;">4</p> <p>1 I N D E X</p> <table border="0"> <tr> <td>2 WITNESS</td> <td style="text-align: right;">PAGE</td> </tr> <tr> <td>3 CHANDRA NAGARAJAN</td> <td></td> </tr> <tr> <td>4 Examination by Mr. Lee</td> <td style="text-align: right;">10</td> </tr> <tr> <td>5</td> <td></td> </tr> <tr> <td>6</td> <td></td> </tr> <tr> <td>7 I N D E X O F E X H I B I T S</td> <td></td> </tr> <tr> <td>8 EXHIBITS DESCRIPTION PAGE</td> <td></td> </tr> <tr> <td>9 Exhibit 41 Sprint Goals, Bates number</td> <td style="text-align: right;">91</td> </tr> <tr> <td>10 JNPR-FNJJN_29017_00552598</td> <td></td> </tr> <tr> <td>11 Exhibit 42 Bates number</td> <td style="text-align: right;">114</td> </tr> <tr> <td>12 JNPR-FNJJN_29030-00553835</td> <td></td> </tr> <tr> <td>13 Exhibit 43 Cloud-Delivered Security, Security</td> <td style="text-align: right;">116</td> </tr> <tr> <td>14 Summit April 2016, Bates number</td> <td></td> </tr> <tr> <td>15 JNPR-FNJJN_29008-00522076</td> <td></td> </tr> <tr> <td>16 Exhibit 44 Argon Reporting/Dashboard Proposal,</td> <td style="text-align: right;">131</td> </tr> <tr> <td>17 Bates number</td> <td></td> </tr> <tr> <td>18 JNPR-FNJJN_29017_00552784</td> <td></td> </tr> <tr> <td>19 Exhibit 45 Bates number</td> <td style="text-align: right;">135</td> </tr> <tr> <td>20 JNPR-FNJJN_290032_00590572</td> <td></td> </tr> <tr> <td>21 Exhibit 46 Catalog of applications connecting</td> <td style="text-align: right;">147</td> </tr> <tr> <td>22 to the common database, Bates number</td> <td></td> </tr> <tr> <td>23 JNPR-FNJJN_29017_00552771</td> <td></td> </tr> <tr> <td>24 Exhibit 47 IDB (Common DB), Bates number</td> <td style="text-align: right;">150</td> </tr> <tr> <td>25 JNPR-FNJJN_29017_00552603</td> <td></td> </tr> </table>	2 WITNESS	PAGE	3 CHANDRA NAGARAJAN		4 Examination by Mr. Lee	10	5		6		7 I N D E X O F E X H I B I T S		8 EXHIBITS DESCRIPTION PAGE		9 Exhibit 41 Sprint Goals, Bates number	91	10 JNPR-FNJJN_29017_00552598		11 Exhibit 42 Bates number	114	12 JNPR-FNJJN_29030-00553835		13 Exhibit 43 Cloud-Delivered Security, Security	116	14 Summit April 2016, Bates number		15 JNPR-FNJJN_29008-00522076		16 Exhibit 44 Argon Reporting/Dashboard Proposal,	131	17 Bates number		18 JNPR-FNJJN_29017_00552784		19 Exhibit 45 Bates number	135	20 JNPR-FNJJN_290032_00590572		21 Exhibit 46 Catalog of applications connecting	147	22 to the common database, Bates number		23 JNPR-FNJJN_29017_00552771		24 Exhibit 47 IDB (Common DB), Bates number	150	25 JNPR-FNJJN_29017_00552603	
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<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 Chandra Nagarajan in the matter</p> <p>5 of Finjan Incorporated versus Juniper Networks</p> <p>6 Incorporated, et al., held in the United States District</p> <p>7 Court, Northern District of California, San Francisco</p> <p>8 Division. Case number 3:17-CV-05659-WHA.</p> <p>9 Today's date is May 31st, 2018, and the time</p> <p>10 on the video monitor is 9:06 a.m.</p> <p>11 Your videographer today is John Torreano</p> <p>12 representing on behalf of Planet Depos.</p> <p>13 This video deposition is taking place at</p> <p>14 Juniper Networks Incorporated, street address</p> <p>15 1133 Innovation Way, Building A in Sunnyvale, California</p> <p>16 94089.</p> <p>17 Would counsel please voice identify themselves</p> <p>18 and state whom they represent in this action.</p> <p>19 MR. LEE: Michael Lee from Kramer Levin</p> <p>20 representing Finjan. And with me is Linda Xu from</p> <p>21 Kramer Levin as well.</p> <p>22 MR. KAGAN: Jonathan Kagan of Irell and</p> <p>23 Manella representing Juniper Networks.</p> <p>24 THE VIDEOGRAPHER: Your court reporter today</p> <p>25 is Charlotte Lacey representing on behalf of Planet</p>	<p>1 <b>to be responsible for Junosphere, but that product is</b></p> <p>2 <b>end of life right now.</b></p> <p>3 THE REPORTER: I'm sorry. "I was responsible</p> <p>4 for"...?</p> <p>5 THE WITNESS: Junosphere.</p> <p>6 THE REPORTER: Junosphere. Thank you.</p> <p>7 Q What is the name of the intrusion prevention</p> <p>8 product?</p> <p>9 <b>A It's -- it's part of the SRX, but then I own</b></p> <p>10 <b>the team which writes signatures to -- to stop the</b></p> <p>11 <b>exploits.</b></p> <p>12 Q Is there a name for this intrusion prevention</p> <p>13 product?</p> <p>14 <b>A It is -- there's a separate license in SRX for</b></p> <p>15 <b>this. That's about it. It's called IPS.</b></p> <p>16 Q And that stands for Intrusion Prevention</p> <p>17 System?</p> <p>18 <b>A That's right.</b></p> <p>19 Q You mentioned Sky ATP?</p> <p>20 <b>A Uh-huh.</b></p> <p>21 Q What is Sky ATP?</p> <p>22 <b>A Sky ATP is a cloud-delivered advanced threat</b></p> <p>23 <b>prevention service. It -- it works directly with SRX</b></p> <p>24 <b>and then try -- it tries to get files out of the</b></p> <p>25 <b>network, whatever is going through the network and makes</b></p>
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<p>1 Depos.</p> <p>2 If there are no stipulations or comments from</p> <p>3 counsel, would the court reporter please swear in the</p> <p>4 witness.</p> <p>5 CHANDRA NAGARAJAN,</p> <p>6 the witness herein, having been first duly sworn, was</p> <p>7 examined and testified as follows:</p> <p>8 EXAMINATION</p> <p>9 BY MR. LEE:</p> <p>10 Q Where do you work?</p> <p>11 <b>A I work in Juniper Networks.</b></p> <p>12 Q What's your position at Juniper Networks?</p> <p>13 <b>A My position is a senior director in the</b></p> <p>14 <b>security business group.</b></p> <p>15 Q What are your responsibilities?</p> <p>16 <b>A I manage a team of engineers and -- I'm</b></p> <p>17 <b>responsible for the engineering delivery of the product.</b></p> <p>18 <b>So I ensure we get the right specifications for the</b></p> <p>19 <b>product, and then we execute the schedule we come up</b></p> <p>20 <b>with for the features requested.</b></p> <p>21 Q Which product?</p> <p>22 <b>A There are a couple of products I'm responsible</b></p> <p>23 <b>for. One is the Sky ATP. The other one is the -- we</b></p> <p>24 <b>have an intrusion detection prevention product, so I'm</b></p> <p>25 <b>responsible for that. Previously, when I joined, I used</b></p>	<p>1 <b>a determination, to the best of its ability, what the</b></p> <p>2 <b>threat level of those files are. And it's -- it's</b></p> <p>3 <b>basically a SAS type of product where the most of the</b></p> <p>4 <b>functionalities reside in the cloud and the user itself</b></p> <p>5 <b>logs into the cloud and most of the input -- input on</b></p> <p>6 <b>the user interface is on the cloud site.</b></p> <p>7 Q What does Sky ATP stand for?</p> <p>8 <b>A Sky is, I guess, is just a brand name, and the</b></p> <p>9 <b>A. T. P. is for advanced threat prevention.</b></p> <p>10 Q What is advanced threat prevention?</p> <p>11 <b>A What is advanced -- so the advanced threat</b></p> <p>12 <b>prevention, the name mainly comes because in the market,</b></p> <p>13 <b>there are a lot of AVs which can detect if something</b></p> <p>14 <b>is -- is good or bad based on what they know. But</b></p> <p>15 <b>advanced threat prevention is something even if you get</b></p> <p>16 <b>a file, which it doesn't know about, it tries to</b></p> <p>17 <b>evaluate to the best of its capability and determines</b></p> <p>18 <b>the threat level.</b></p> <p>19 Q So advanced threat prevention is for unknown</p> <p>20 threats?</p> <p>21 MR. KAGAN: Objection; form.</p> <p>22 <b>A Advanced threat protection is both for known</b></p> <p>23 <b>threats and also for unknown threats.</b></p> <p>24 Q What are the key components of Sky ATP?</p> <p>25 MR. KAGAN: Objection; form.</p>