

EXHIBIT 16

Transcript of Khurram Islah, Corporate Designee
 Conducted on February 7, 2019

<p style="text-align: center;">1</p> <p>1 IN THE 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 : 6 Corporation, : 7 Plaintiff, : Case No. : 8 vs. : 3:17-CV-05659-WHA</p> <p>9 JUNIPER NETWORKS, INC., a : 10 Delaware Corporation, : 11 Defendant. :</p> <p>12 -----X</p> <p>13</p> <p>14 VIDEOTAPED 30(b)(6) DEPOSITION OF 15 JUNIPER NETWORKS, INC. 16 DESIGNEE: KHURRAM ISLAH 17 Sunnyvale, California 18 Thursday, February 7, 2019 19 9:42 a.m.</p> <p>20</p> <p>21</p> <p>22</p> <p>23 Job No.: 228017 24 Pages 1 - 139 25 Reporter: Jenny L. Griffin, RMR, CSR, CRR, CRRR, CRC</p>	<p style="text-align: center;">3</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>1</p> <p>2</p> <p>3 For the Plaintiff Finjan, Inc.:</p> <p>4 KRAMER LEVIN NAFTALIS & FRANKEL LLP</p> <p>5 BY: MICHAEL H. LEE, ESQ.</p> <p>6 990 Marsh Road</p> <p>7 Menlo Park, California 94025</p> <p>8</p> <p>9 For the Defendant Juniper Networks, Inc. 10 and the Witness:</p> <p>11 IRELL & MANELL LLP</p> <p>12 BY: REBECCA CARSON, ESQ.</p> <p>13 840 Newport Center Drive</p> <p>14 Suite 400</p> <p>15 Newport Beach, California 926606324</p> <p>16</p> <p>17 VIDEOGRAPHER: Lucien Newell</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;">2</p> <p>1 Videotaped Deposition of KHURRAM ISLAH, 2 held at the offices of:</p> <p>3</p> <p>4</p> <p>5 Juniper Networks, Inc. 6 1133 Innovation Way 7 Building A 8 Sunnyvale, California 94089</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15 Pursuant to Notice, before Jenny L. Griffin, 16 California Certified Shorthand Reporter #3969, 17 Registered Merit Reporter, Certified Realtime 18 Reporter, California Certified Realtime Reporter, 19 Certified Realtime Captioner.</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 style="text-align: center;">C O N T E N T S</p> <p>1 EXAMINATION OF KHURRAM ISLAH</p> <p>2</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;"></td> <td style="text-align: right; width: 20%;">PAGE</td> </tr> <tr> <td>3 PROCEEDINGS</td> <td style="text-align: right;">6</td> </tr> <tr> <td>4 BY MR. LEE</td> <td style="text-align: right;">7</td> </tr> <tr> <td>5 BY MS. CARSON</td> <td style="text-align: right;">136</td> </tr> </table> <p>6</p> <p>7</p> <p style="text-align: center;">E X H I B I T S</p> <p>8 (Attached to the Transcript)</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;"></td> <td style="width: 70%;"></td> <td style="text-align: right; width: 20%;">PAGE</td> </tr> <tr> <td>9 ISLAH</td> <td>DEPOSITION EXHIBIT</td> <td></td> </tr> <tr> <td>10 Exhibit 1</td> <td>License Agreement - Joe Security LLC and Juniper Networks, Inc. (JNPR-FNJD_29035_00962471-2499)</td> <td style="text-align: right;">12</td> </tr> <tr> <td>11</td> <td></td> <td></td> </tr> <tr> <td>12 Exhibit 2</td> <td>Joe's Sandbox Installation Guide (JNPR-FNJD_29040_01462115-2143)</td> <td style="text-align: right;">30</td> </tr> <tr> <td>13</td> <td></td> <td></td> </tr> <tr> <td>14 Exhibit 3</td> <td>License Agreement - Joe Security LLC and Juniper Networks, Inc. (JNPR-FNJD_29035_00962500-2515)</td> <td style="text-align: right;">37</td> </tr> <tr> <td>15</td> <td></td> <td></td> </tr> <tr> <td>16 Exhibit 4</td> <td>Email from Raju Manthena -11/5/15 - Subject: Improving Deception (JNPR-FNJD_29040_01180535)</td> <td style="text-align: right;">73</td> </tr> <tr> <td>17</td> <td></td> <td></td> </tr> <tr> <td>18 Exhibit 5</td> <td>Joe Sandbox Desktop 13.0.0 (13.11.2015) (JNPR-FNJD_29040_01280968-0978)</td> <td style="text-align: right;">83</td> </tr> <tr> <td>19</td> <td></td> <td></td> </tr> <tr> <td>20 Exhibit 6</td> <td>Joe Sandbox Brief - Jankins Zhan Feb/07/2017 (JNPR-FNJD_29033_00665289-5300)</td> <td style="text-align: right;">100</td> </tr> <tr> <td>21</td> <td></td> <td></td> </tr> <tr> <td>22 Exhibit 7</td> <td>Document (JNPR-FNJD_29040_01194632-4645)</td> <td style="text-align: right;">111</td> </tr> <tr> <td>23</td> <td></td> <td></td> </tr> <tr> <td>24 Exhibit 8</td> <td>Sky ATP Analysis Pipeline (JNPR-FNJD_29017_00552908-2915)</td> <td style="text-align: right;">113</td> </tr> <tr> <td>25</td> <td></td> <td></td> </tr> </table>		PAGE	3 PROCEEDINGS	6	4 BY MR. LEE	7	5 BY MS. CARSON	136			PAGE	9 ISLAH	DEPOSITION EXHIBIT		10 Exhibit 1	License Agreement - Joe Security LLC and Juniper Networks, Inc. (JNPR-FNJD_29035_00962471-2499)	12	11			12 Exhibit 2	Joe's Sandbox Installation Guide (JNPR-FNJD_29040_01462115-2143)	30	13			14 Exhibit 3	License Agreement - Joe Security LLC and Juniper Networks, Inc. (JNPR-FNJD_29035_00962500-2515)	37	15			16 Exhibit 4	Email from Raju Manthena -11/5/15 - Subject: Improving Deception (JNPR-FNJD_29040_01180535)	73	17			18 Exhibit 5	Joe Sandbox Desktop 13.0.0 (13.11.2015) (JNPR-FNJD_29040_01280968-0978)	83	19			20 Exhibit 6	Joe Sandbox Brief - Jankins Zhan Feb/07/2017 (JNPR-FNJD_29033_00665289-5300)	100	21			22 Exhibit 7	Document (JNPR-FNJD_29040_01194632-4645)	111	23			24 Exhibit 8	Sky ATP Analysis Pipeline (JNPR-FNJD_29017_00552908-2915)	113	25		
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<p style="text-align: center;">5</p> <p>1 E X H I B I T S C O N T I N U E D</p> <p>2 (Attached to the Transcript)</p> <p>3 ISLAH DEPOSITION EXHIBIT PAGE</p> <p>4 Exhibit 9 Reputation Client & Server 119</p> <p>5 Document</p> <p>6 (JNPR-FNJJN_29017_00552634-2651)</p> <p>7 Exhibit 10 VE Efficacy, Oct. 30 123</p> <p>8 (JNPR-FNJJN_29017_00552814-2828)</p> <p>9 Exhibit 11 Joe Sandbox Cookbook Guide, Last 135</p> <p>10 Update: 01.06.2016</p> <p>11 Exhibit 12 Cookbook Script 136</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;">7</p> <p>1 KHURRAM ISLAH,</p> <p>2 being first duly sworn and/or affirmed by the</p> <p>3 Certified Shorthand Reporter to tell the truth, the</p> <p>4 whole truth, and nothing but the truth, testified as</p> <p>5 follows:</p> <p>6 EXAMINATION</p> <p>7 BY MR. LEE:</p> <p>8 Q. Please state your name for the record.</p> <p>9 A. Khurram Islah.</p> <p>10 Q. Where do you work?</p> <p>11 A. I work at Juniper Networks.</p> <p>12 Q. What's your position at Juniper Networks?</p> <p>13 A. I am a software developer.</p> <p>14 Q. What are your responsibilities?</p> <p>15 A. I work in improving the efficacy of the</p> <p>16 product, specifically the Sky ATP solution. My</p> <p>17 primary focus is on the dynamic analysis.</p> <p>18 Q. Can you elaborate? What do you mean by</p> <p>19 "improving the efficacy of the product"?</p> <p>20 A. The -- looking into the dynamic analysis</p> <p>21 results and improving the detection rate, the false</p> <p>22 positives, the false negatives, the true positives,</p> <p>23 true negatives. Improving all those areas improves</p> <p>24 the efficacy of the product.</p> <p>25 Q. How do you improve those areas?</p>
<p style="text-align: center;">6</p> <p>1 P R O C E E D I N G S</p> <p>2 THE VIDEOGRAPHER: Here begins</p> <p>3 Disk Number 1 in the videotaped deposition of</p> <p>4 Khurram Islah in the matter of Finjan, Inc., versus</p> <p>5 Juniper Networks, Inc., et al. in the United States</p> <p>6 District Court, Northern District of California,</p> <p>7 San Francisco Division, Case Number</p> <p>8 3:17-CV-05659-WHA.</p> <p>9 Today's date is February 7th, 2019. The</p> <p>10 time on the video monitor is 9:42. The videographer</p> <p>11 today is Lucien Newell, representing Planet Depos.</p> <p>12 This video deposition is taking place at</p> <p>13 1133 Innovation Way, Building A, Sunnyvale,</p> <p>14 California 94089.</p> <p>15 Would counsel please voice-identify</p> <p>16 themselves and state whom they represent.</p> <p>17 MR. LEE: Michael Lee from Kramer Levin,</p> <p>18 representing Finjan.</p> <p>19 MS. CARSON: Rebecca Carson of Irell &</p> <p>20 Manella, representing Juniper Networks and the</p> <p>21 witness.</p> <p>22 THE VIDEOGRAPHER: The court reporter today</p> <p>23 is Jenny Griffin, representing Planet Depos.</p> <p>24 Would the reporter please swear in the</p> <p>25 witness.</p>	<p style="text-align: center;">8</p> <p>1 A. One way of improving -- for example, in</p> <p>2 dynamic analysis -- is to ensure that your detection</p> <p>3 is close to what the actual classification should</p> <p>4 be.</p> <p>5 Q. How do you ensure that the detection is</p> <p>6 close to the actual classification?</p> <p>7 A. So specifically in the domain of dynamic</p> <p>8 analysis, where you are dependent on certain</p> <p>9 features, as a developer and looking into the</p> <p>10 details of the features, have to figure out what</p> <p>11 features are good for the solutions and what could</p> <p>12 create a false positive.</p> <p>13 Having a false positive is not good for a</p> <p>14 product, so we try to look into details and figure</p> <p>15 out how we could improve by adding in features or</p> <p>16 removing existing features based on the data that we</p> <p>17 think is good enough to look into.</p> <p>18 Q. Are you solely responsible for the dynamic</p> <p>19 analysis part of Sky ATP?</p> <p>20 A. This is my main area of focus. I'm</p> <p>21 responsible for improving the efficacy of the</p> <p>22 dynamic analysis. There are other engineers that</p> <p>23 help me in this domain.</p> <p>24 It's a big team, but my primary focus is on</p> <p>25 dynamic analysis.</p>

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9	<p>1 Q. What other areas are you focused on other 2 than dynamic analysis? 3 A. When it comes to the efficacy of the 4 product, we have to see that we are synced with the 5 other adapters. So we work in conjunction with all 6 the team members who are working in different areas 7 of the product. But we all have one thing in 8 common, which is to improve the efficacy of the 9 product. And I represent the dynamic analysis side 10 of it. 11 Q. Is there a name for this dynamic analysis? 12 MS. CARSON: Objection. Form. 13 THE WITNESS: We usually use it as dynamic 14 analysis. And there is no such name -- if you have 15 probably -- I'm not sure -- you want an industry 16 standard name for it? 17 BY MR. LEE: 18 Q. Does your team refer to the dynamic 19 analysis as any other name? 20 A. Oh, no. So far -- we use it in different 21 terms, but I think that "dynamic analysis" is 22 usually the term that we use. It's a general term 23 that is come across when we have team meetings. But 24 we may -- I mean, others may be talking in a 25 different way, but I think, in general, that's what</p>	11
10	<p>1 it is. It's a dynamic analysis focus. 2 Q. What are the components of dynamic 3 analysis? 4 A. What is the -- 5 Q. Components? 6 A. Components. 7 MS. CARSON: Objection. Form. 8 THE WITNESS: Components of dynamic 9 analysis would be quite many, like I just explained. 10 It's -- how do I start? 11 See, dynamic analysis is based on features, 12 and so I probably need to understand what do you 13 mean by "components." 14 BY MR. LEE: 15 Q. For example, you mentioned adapters. 16 A. Yes. 17 Q. Is there an adapter for dynamic analysis? 18 A. Yes. We have an adapter. We call it 19 Deception. 20 Q. Is there any other components to dynamic 21 analysis other than Deception? 22 A. So when we analyze a sample under dynamic 23 analysis -- I'll tell you a whole flow, and probably 24 you may find what you're looking for. 25 It comes through the adapter, and the</p>	12
9	<p>1 adapter submits it to a third-party solution called 2 Joe Security. And we get a report back to the 3 adapter, and then the adapter looks into what has 4 been received. 5 Does that answer what you -- 6 Q. So the Deception adapter submits the file 7 to Joe Security? 8 A. The Deception adapter submits the file to 9 Joe Security as a third-party solution, yes. 10 Q. And Joe Security creates a report? 11 A. Joe Security -- the way it works as a 12 solution is the input to the solution is -- has to 13 be some sort of file or files. And the output 14 that -- the result would be in some sort of a JSON 15 report. 16 (Reporter clarification.) 17 BY MR. LEE: 18 Q. Which product of the Joe Security does 19 Juniper use? 20 MS. CARSON: Objection. Form. 21 THE WITNESS: I know of the license that we 22 have. I'm not sure if it is related to the product. 23 BY MR. LEE: 24 Q. But would it help if you have the license? 25 A. Say that again.</p>	11
10	<p>1 Q. Would it help if you have the license in 2 front of you? 3 A. The license is called -- yeah. If it -- 4 it's ... 5 (Exhibit 1 was marked for 6 identification and is attached to the 7 transcript.) 8 BY MR. LEE: 9 Q. You've been handed an exhibit marked as 10 Exhibit Number 1. Exhibit Number 1 is basically 11 JNPR-FNPN_29035_00962471 to -499. 12 Do you recognize Exhibit Number 1? 13 A. This is a question to me? 14 Q. Yes. 15 A. I have never looked into the license 16 before. It's been done by the management. When -- 17 what I mean was the version -- this page, the 18 license software, page 14. 19 Q. You're referring to what's listed under 20 "Licensed Software"? 21 A. Yes. So what I'm aware of is the Joe 22 Sandbox Ultimate is the software package that we 23 use. 24 Q. Do you see under "Joe Sandbox Ultimate" 25 there are six items?</p>	12

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4 (13 to 16)

13	<p>1 Do you know where those six items are?</p> <p>2 MS. CARSON: Objection. Form.</p> <p>3 THE WITNESS: We -- I don't know all of</p> <p>4 them because we don't use all of them.</p> <p>5 BY MR. LEE:</p> <p>6 Q. Which ones are not used?</p> <p>7 A. This is a license. It is giving us the</p> <p>8 luxury to use all these features. But when it comes</p> <p>9 to feature, it may be divided between two licenses,</p> <p>10 if you understand what I'm trying to say.</p> <p>11 Q. Can you explain?</p> <p>12 A. A feature which is in mobile could be a</p> <p>13 feature in desktop also. So it's hard to say that a</p> <p>14 feature that I picked for one is not there in the</p> <p>15 other.</p> <p>16 I could tell from respect of the features,</p> <p>17 if you have questions, what features we use. But</p> <p>18 there is no fine line among the licenses that I</p> <p>19 could draw and say we don't use a certain one and we</p> <p>20 do use the others based on the licenses.</p> <p>21 We get an Ultimate. From there we get a</p> <p>22 bunch of features in there, we pick some, and we</p> <p>23 leave a lot out.</p> <p>24 Q. Do you know if Juniper uses Joe Sandbox</p> <p>25 Desktop?</p>	15
14	<p>1 A. We just use the Ultimate license, but we</p> <p>2 never use one specific piece of it. There is -- if</p> <p>3 you look into the package where it -- how it's given</p> <p>4 to us, it's not divided among these sets. It's one</p> <p>5 package, one source code, which gives you the luxury</p> <p>6 to use all of these features.</p> <p>7 And we handpick features, but when I'm</p> <p>8 picking a feature, I don't get to know which part it</p> <p>9 belongs to. I just know it belongs to the Sandbox</p> <p>10 Ultimate package. And if I pick some other package,</p> <p>11 it may not be there.</p> <p>12 Q. Do you know what Joe Sandbox Desktop does?</p> <p>13 A. By looking at these, a general way of</p> <p>14 analyzing this is Joe Sandbox Desktop is heavier on</p> <p>15 features, will take more time to analyze than Joe</p> <p>16 Sandbox Light. That's how they differentiate. What</p> <p>17 features they are adding, what not they are adding,</p> <p>18 I still don't know. That's one way of</p> <p>19 differentiating between Desktop and Light, is</p> <p>20 Desktop will have more features.</p> <p>21 Q. So just to be clear, the six features --</p> <p>22 sorry.</p> <p>23 There are six products listed under Joe</p> <p>24 Sandbox Ultimate; is that correct?</p> <p>25 A. I wouldn't say these are products. It may</p>	16
15	<p>1 be the definition that Joe Sandbox team uses. But</p> <p>2 when it comes to us, it's one package of Ultimate</p> <p>3 which has the capabilities of all these listed here.</p> <p>4 Q. How would you characterize these six items?</p> <p>5 A. I would characterize them as capabilities</p> <p>6 of Joe Sandbox to us. They have given us the</p> <p>7 capability to run all the features, to run Light</p> <p>8 features, to run Mobile features, to run some</p> <p>9 filtering, to run classes, to run some X features.</p> <p>10 But for me, as a developer, these are just</p> <p>11 bunch of features that are intermingled between</p> <p>12 licenses.</p> <p>13 Q. To be clear for the record, in Exhibit 1 at</p> <p>14 page 14, there are six capabilities listed: Joe</p> <p>15 Sandbox Desktop, Joe Sandbox Light, Joe Sandbox</p> <p>16 Mobile, Joe Sandbox X, Joe Sandbox Class, and Joe</p> <p>17 Sandbox Filter; correct?</p> <p>18 A. That's right.</p> <p>19 Q. And you don't know which of these does</p> <p>20 Juniper use; correct?</p> <p>21 MS. CARSON: Objection. Form.</p> <p>22 THE WITNESS: The problem with -- to answer</p> <p>23 this question is these are all executables for us.</p> <p>24 I cannot look into the source code. It's a</p> <p>25 third-party solution, so they have the fine line</p>	16

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