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13 JUNIPER NETWORKS, INC.

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15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 FINJAN, INC., a Delaware Corporation,) Case No. 3:17-cv-05659-WHA
19)
Plaintiff,) **DECLARATION OF KHURRAM ISLAH**
20 vs.) **IN SUPPORT OF DEFENDANT JUNIPER**
21) **NETWORKS, INC.’S OPPOSITION TO**
JUNIPER NETWORKS, INC., a Delaware) **PLAINTIFF FINJAN, INC.’S MOTION**
22 Corporation,) **FOR RELIEF FROM JUDGMENT**
23) **PURSUANT TO FED. R. CIV. P. 60(B)**
Defendant.)
24) Date: May 9, 2019
25) Time: 8:00 a.m.
26) Courtroom: Courtroom 12, 19th Floor
27) Before: Hon. William Alsup
28)

DECLARATION OF KHURRAM ISLAH

I, Khurram Islah, declare as follows:

1. I am an employee of Juniper Networks, Inc. (“Juniper”). I have personal knowledge of the facts set forth in this declaration, and I could and would testify competently thereto if called upon to do so. I make this declaration in support of Juniper’s Opposition to Finjan’s Motion for Relief from Judgment Pursuant to Fed. R. Civ. P. 60(b).

2. I am a software developer on the Sky ATP team. In developing the product, the Sky ATP team uses three network repositories to share information: Confluence (which is the primary repository for design and development documents) and Jira and GNATS (which are bug tracking and project management software).

3. My primary area of focus is Sky ATP’s dynamic analysis. Sky ATP currently uses a third-party product from Joe Security called Joe Sandbox to perform dynamic analysis. Among the Sky ATP team, I have primary responsibility for the integration of the Joe Sandbox product into the Malware Analysis Pipeline of Sky ATP.

4. Because Joe Sandbox is a third-party product that was not developed by Juniper engineers, Juniper does not have access to the Joe Sandbox source code or the technical design or development documents for Joe Sandbox. Rather, Joe Security delivers Joe Sandbox to Juniper as binary code. For example, when there is an update to the Joe Sandbox software, I log into the Joe Security customer portal and download a .zip file containing the updated software to the iWeb server that Juniper uses to deploy Joe Sandbox.

5. In late 2018 or early 2019, I was asked to try to find several specific Joe Security documents. As part of my search, I looked in the .zip file that I had downloaded onto the iWeb servers for the version of Joe Security that was running on those servers. I was able to locate the twelve documents that Juniper produced on February 4, 2019 in one of the .zip files that was still located on the iWeb server.

6. To my knowledge, the iWeb server is not typically used to store technical documents related to Sky ATP. In other words, the Joe Security documents were stored on the

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1 iWeb server simply because they happened to be contained in the .zip file with the binary code for
2 Joe Sandbox.

3 7. As a general matter, I do not upload any third-party documentation from Joe
4 Security (e.g., User Manuals, etc.) into the technical document repositories for Sky ATP. This is
5 because these documents are not frequently used by Juniper engineers, and only need to be
6 accessed if something appears to be broken or if we are considering adding a new functionality
7 offered by Joe Sandbox (neither of which is common).

8 8. I am not aware of any search tool on the Juniper network that would allow one to
9 search the third-party iWeb server for documents. To find the documents on the iWeb server, I
10 specifically navigated to the .zip files to look for them.

11 9. As I noted above, Joe Sandbox is used to perform dynamic analysis. Sky ATP uses
12 the “deception adapter” to interface with the Joe Sandbox binary code by way of a Web API,
13 which allows Sky ATP to submit a sample to Joe Sandbox and then retrieve the results from Joe
14 Sandbox when the analysis is completed.

15 10. Joe Sandbox’s dynamic analyzer is part of the “Malware Analysis Pipeline” of Sky
16 ATP; the dynamic analyzer is not found within the “ResultsDB” portion of Sky ATP, as
17 “ResultsDB” is a separate part of Sky ATP that coordinates storing the results from the various
18 analyses performed by the Malware Analysis Pipeline. The other components of the Malware
19 Analysis Pipeline (e.g, static analysis, antivirus engine, etc.) do not send results to the Joe
20 Sandbox database for storage. Rather, the results from the Malware Analysis Pipeline are sent to
21 DynamoDB or S3 for storage.

22 I declare under penalty of perjury under the laws of the United States of America that the
23 foregoing is true and correct to the best of my knowledge. Executed this 12th day of April, 2019
24 at Sunnyvale, California.

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26 By: /s/ Khurram Islah
27 Khurram Islah
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