EXHIBIT 4

Holland, Eileen

From:	Kastens, Kris <KKastens@KRAMERLEVIN.com>
Sent:	Tuesday, October 16, 2018 9:38 AM
To:	Glucoft, Josh
Cc:	Carson, Rebecca; Holland, Eileen; Song, Sharon; Curran, Casey; Wang, Kevin; Kagan, Jonathan; ~Andre, Paul; ~Kobialka, Lisa; ~Hannah, James; ~Manes, Austin
Subject:	RE: Finjan/Juniper-Joint Response re ESI Discovery Process

Josh,

We are following up on a number of discovery issues. First, you indicated several months ago that Mr. Volodymyr Kuznetsov was on paternity leave and unavailable for deposition. Provide dates that he is available for deposition.

Finjan also requests that the parties meet and confer on the following 30(b)(6) topics for deposition:

- Any efforts by Juniper to incorporate or use any technologies provided by Joe Security LLC into any of the Accused Products, including identification of all technologies provided by Joe Security LLC to Juniper, a description of how the technologies provided by Joe Security LLC are incorporated by or used by the Accused Products, a description of how the technologies provided by Joe Security are hosted or managed by Juniper, and identification of the relevant source code.

- The total number of threats, malware, files detected, classified, analyzed or received by each of the Accused Products, including the full bases and supporting information for Juniper's Responses to Interrogatory No. 5, and any costs associated therewith.

- Development and research costs associated with each of the Accused Products.

Additionally, Finjan agrees to narrow its ESI search terms for Bruce Kao and Chandra Nagarajan as set for the below in red. Finjan has also provided initial ESI search terms for Frank Jas.

Finally, please confirm that Juniper has not made any additional source code available for inspection since Finjan's last review.

Sincerely,
Kris

	Behavior **/20 profile**	5,436
	Profile **/20 operation**	8,170
	Hash	2,509
Bruce Kao	Dropper	4
	Database	2,141
	Express	1,050
	Malware **/20 (javascript OR "java script")**	6,426

	Finjan	117

	Feature AND (greyduckling or "grey duckling")	38,785
	behavior AND (Argon OR Sky ATP)	3,319
	sandbox AND (Argon OR Sky ATP)	3,316
Chandra Nagarajan	static AND (Argon OR Sky ATP) AND analysis	10,623
	database AND (Argon OR Sky ATP) AND schema	4,955
	Dropper	163
	hash AND (Argon OR Sky ATP)	4,692
	Finjan	206

	Sandbox	
	Behavior	
	profile	
	database	
Frank Jas	Static	
	payload	
	malicious	
	Finjan	

Kris Kastens
Partner

Kramer Levin Naftalis & Frankel LLP
990 Marsh Road, Menlo Park, California 94025
T 650.752.1715   F 650.752.1815

From: Glucoft, Josh [mailto:JGlucoft@irell.com]
Sent: Sunday, May 20, 2018 5:14 PM
To: Kastens, Kris; #Finjan-KramerLevin [Ext]
Cc: #Juniper/Finjan [Int]
Subject: [EXTERNAL] RE: Finjan/Juniper-Joint Response re ESI Discovery Process

Kris,

The hit counts for the modified search terms are as follows:

Rakesh Manocha
- Behavior AND suspicious: 193

Chandra Nagarajan
- Feature: 38,785
- Behavior AND (Argon OR Sky ATP): 3,319
- Sandbox AND (Argon OR Sky ATP): 3,316

For Mr. Kao, Finjan's indiscriminate search terms yielded almost 26 thousand hits that, when including attachments, yielded just shy of **39 thousand** documents from Mr. Kao's email search alone. The overwhelming number of documents falling within the scope of Finjan's search terms demonstrates that Finjan's terms are not narrowly tailored to particular issues, as required by the Court's ESI Order. Juniper again requests that Finjan meaningfully narrow its search terms for these three custodians when Finjan identifies the final list of search terms for these custodians. Should Finjan continue to refuse to apply narrowing search criteria, Juniper requests that Finjan agree to pay the costs of such disproportionate discovery burden, and Juniper reserves the right to seek appropriate relief from the Court.

Thanks,
Josh

From: Glucoft, Josh
Sent: Sunday, May 13, 2018 9:23 PM
To: ~Kastens, Kristopher
Cc: #Finjan-KramerLevin [Ext]; #Juniper/Finjan [Int]
Subject: RE: Finjan/Juniper-Joint Response re ESI Discovery Process

Kris,

Finjan's "modified" search terms do not meaningfully narrow the scope of the search. For Mr. Kao, you have not narrowed your search terms at all, maintaining overly broad terms such as "profile" that yield more than **8,000** hits. You similarly maintain unmodified search terms for Mr. Manocha and Mr. Nagarajan that each yield thousands upon thousands of hits. These search terms are not narrowly tailored to particular issues, as expressly required by the Court's ESI Order, especially given that internal emails do not define the operation of any of the accused products and therefore their relevance to a case of direct patent infringement is dubious.

The ESI Order states "Use of narrowing search criteria…is encourage to limit the production and shall be considered when determining whether to shift costs for disproportionate discovery." Juniper requests that Finjan meaningfully narrow its search terms for all three custodians or agree to pay the costs of such disproportionate discovery.

Best,
Josh

From: Kastens, Kris [mailto:KKastens@KRAMERLEVIN.com]
Sent: Friday, May 11, 2018 11:33 AM
To: Glucoft, Josh
Cc: ~Andre, Paul; ~Kobialka, Lisa; ~Hannah, James; ~Lee, Michael; Wang, Kevin; Carson, Rebecca; Holland, Eileen; Curran, Casey
Subject: RE: Finjan/Juniper-Joint Response re ESI Discovery Process

Josh,
Finjan modifies its search terms as set forth below.

Custodian	Keywords	Hits/Results
Rakesh Manocha	sandbox	1,984

	Behavior AND suspicious	30,275
	profile AND security	9,307
	hash AND security	2,193
	dropper	17
	database AND security	6,155
	malware AND security	1,849
	Finjan	65

	behavior	5,436
	profile	8,170
	hash	2,509
Bruce Kao	dropper	4
	database	2,141
	express	1,050
	malware	6,426
	Finjan	117

	~~Sandbox~~ feature	10,383
	behavior AND (Argon OR Sky ATP)	16,692
	~~dynamic~~ sandbox AND (Argon OR Sky ATP)	3,650
Chandra Nagarajan	static AND (Argon OR Sky ATP)	10,623
	database AND (Argon OR Sky ATP)	4,955
	dropper	163
	hash AND (Argon OR Sky ATP)	4,692
	Finjan	206

Kris Kastens
Associate

Kramer Levin Naftalis & Frankel LLP
990 Marsh Road, Menlo Park, California 94025
T 650.752.1715   F 650.752.1815

From: Glucoft, Josh [mailto:JGlucoft@irell.com]
Sent: Wednesday, May 09, 2018 4:13 PM
To: Kastens, Kris; #Finjan-KramerLevin [Ext]
Cc: #Juniper/Finjan [Int]
Subject: [EXTERNAL] RE: Finjan/Juniper-Joint Response re ESI Discovery Process

Kris,

Below are the email hit counts for the search terms that Finjan selected. As you can see, the terms generated an enormous number of hits because the terms are not narrowly tailored to particular issues. For example, the indiscriminate term

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