

Exhibit 1

1 6. The term “Accused Instrumentalities” shall include the following Juniper products and
2 services: Defendant’s SRX Gateways including the: SRX110; SRX220; SRX300; SRX550; SRX1400;
3 SRX1500; SRX3400; SRX3600; SRX4000; SRX5400; SRX5600; and SRX5800 gateway appliances,
4 as well as the vSRX Virtual Firewall and cSRX Container Firewall (collectively, “SRX Gateways”) as
5 described in the Complaint, including but not limited to at Exhibit 9 and paragraphs 43-52;
6 Defendant’s Sky Advanced Threat Protection or “Sky ATP” and Advanced Threat Protection
7 Appliance, as described in the Complaint, including but not limited to at Exhibit 10 and paragraphs 43-
8 52; Defendant’s Junos Space Security Director, as described in the Complaint, including but not
9 limited to at Exhibit 16 and paragraphs 43-52; and Defendant’s Contrail, as described in the
10 Complaint, including but not limited to at Exhibit 17 and paragraphs 43-52. The term “Accused
11 Instrumentalities” shall also include any and all previous or currently contemplated versions, revisions,
12 releases, or continuations of said Juniper products and services, and all additional products accused of
13 infringement by Finjan in this action in infringement contentions or similar pleadings.

14 7. The term “person” or “entity” shall refer to any individual, corporation, proprietorship,
15 association, joint venture, company, partnership, or other business or legal entity, including
16 governmental bodies and agencies. The masculine includes the feminine and vice versa; the singular
17 includes the plural and vice versa.

18 8. The term “document(s)” shall have the broadest meaning ascribed to it by Federal Rule
19 of Civil Procedure 34 and Federal Rule of Evidence 1001, and shall include within its meaning any and
20 all papers, videotapes or video recordings, photographs, films, recordings, memoranda, books, records,
21 accounts, letters, telegrams, correspondence, notes of meetings, notes of conversations, notes of
22 telephone calls, inter-office memoranda or written communications of any nature, recordings of
23 conversations either in writing or by means of any mechanical or electrical recording device, notes,
24 papers, reports, analyses, invoices, canceled checks or check stubs, receipts, minutes of meetings, time
25 sheets, diaries, desk calendars, ledgers, schedules, licenses, financial statements, telephone bills, logs,
26 and any differing versions of the foregoing whether denominated formal, informal, or otherwise, as
27 well as copies of the foregoing which differ in any way, including handwritten notations or other
28

1 **REQUEST FOR PRODUCTION NO. 10:**

2 All documents, communications, or things related to Your reliance on the advice of counsel as a
3 defense to Finjan's claim that You willfully infringed and continue to willfully infringe the Asserted
4 Patents.

5 **REQUEST FOR PRODUCTION NO. 11:**

6 All documents, communications, or things relating to the design, development, structure,
7 architecture, testing, research, updating or operation for each of the Accused Instrumentalities.

8 **REQUEST FOR PRODUCTION NO. 12:**

9 All technical and marketing documents, communications, or things discussing or regarding the
10 components of the Accused Instrumentalities.

11 **REQUEST FOR PRODUCTION NO. 13:**

12 All documents, communications, or things relating to any database or database schema relating
13 to, created for, referenced by, or used by any of the Accused Instrumentalities.

14 **REQUEST FOR PRODUCTION NO. 14:**

15 All documents, communications, or things relating to any presentations, overviews, technical
16 overviews, power point slides, or briefing related to any of the Accused Instrumentalities.

17 **REQUEST FOR PRODUCTION NO. 15:**

18 All documents, communications, or things relating to any API (Application Program Interface)
19 specifications, functional specifications, flow charts, architecture diagrams, or design documents related
20 to any of the Accused Instrumentalities.

21 **REQUEST FOR PRODUCTION NO. 16:**

22 Copies of the source code for each of the Accused Instrumentalities, including but not limited
23 to, all past and present releases, versions, updates, or upgrades.

24 **REQUEST FOR PRODUCTION NO. 17:**

25 Working copies of the most recent version of each of the Accused Instrumentalities.
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1 **REQUEST FOR PRODUCTION NO. 33:**

2 Documents, communications, or things sufficient to show the process by which You detect new
3 malware or security threats or update the Accused Instrumentalities.

4 **REQUEST FOR PRODUCTION NO. 34:**

5 Documents, communications, or things sufficient to show the location where the Accused
6 Instrumentalities are developed, tested, manufactured, distributed, sold, updated and imported.

7 **REQUEST FOR PRODUCTION NO. 35:**

8 Documents, communications, or things sufficient to show the operation, functionality, design,
9 development, testing, manufacturing, distribution, sale, updating and import of SRX Gateways (as
10 described in Finjan's Complaint, including at Exhibit 9).

11 **REQUEST FOR PRODUCTION NO. 36:**

12 Documents, communications, or things sufficient to show the operation, functionality, design,
13 development, testing, manufacturing, distribution, sale, updating and import of Sky Advanced Threat
14 Protection (as described in Finjan's Complaint, including at Exhibit 10).

15 **REQUEST FOR PRODUCTION NO. 37:**

16 Documents, communications, or things sufficient to show the operation, functionality, design,
17 development, testing, manufacturing, distribution, sale, updating and import of the malware inspection
18 pipeline in Sky Advanced Threat Protection (as described in Finjan's Complaint, including at Exhibit
19 10).

20 **REQUEST FOR PRODUCTION NO. 38:**

21 Documents, communications, or things sufficient to show the operation, functionality, design,
22 development, testing, manufacturing, distribution, sale, updating and import of dynamic analysis
23 performed by the Sky Advanced Threat Protection (as described in Finjan's Complaint, including at
24 Exhibit 10).

1 **REQUEST FOR PRODUCTION NO. 39:**

2 Documents, communications, or things sufficient to show the operation, functionality, design,
3 development, testing, manufacturing, distribution, sale, updating and import of static analysis performed
4 by the Sky Advanced Threat Protection (as described in Finjan's Complaint, including at Exhibit 10).

5 **REQUEST FOR PRODUCTION NO. 40:**

6 Documents, communications, or things sufficient to show the operation, functionality, design,
7 development, testing, manufacturing, distribution, sale, updating and import of the cache in the malware
8 inspection pipeline of the Sky Advanced Threat Protection (as described in Finjan's Complaint,
9 including at Exhibit 10).

10 **REQUEST FOR PRODUCTION NO. 41:**

11 Documents, communications, or things sufficient to show the operation, functionality, design,
12 development, testing, manufacturing, distribution, sale, updating and import of Junos Space Security
13 Director (as described in Finjan's Complaint, including at Exhibit 16).

14 **REQUEST FOR PRODUCTION NO. 42:**

15 Documents, communications, or things sufficient to show to the operation, functionality,
16 design, development, testing, manufacturing, distribution, sale, updating and import of Contrail (as
17 described in Finjan's Complaint, including at Exhibit 17).

18 **REQUEST FOR PRODUCTION NO. 43:**

19 Documents, communications, or things sufficient to show Your organizational structure with
20 respect to research, development, engineering, manufacture, assembly, testing, marketing, distribution,
21 sale, licensing, updating and importation of each of the Accused Instrumentalities, including
22 organizational charts.

23 **REQUEST FOR PRODUCTION NO. 44:**

24 All documents, communications, or things relating to the instant litigation.

25 **REQUEST FOR PRODUCTION NO. 45:**

26 All documents, communications, or things on which You intend to rely in support of or
27 opposition to any claim or defense in this litigation.

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