

EXHIBIT 11

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

- - - - -x
FINJAN, INC., a Delaware : Case No.
Corporation, : 3:17-cv-05659-WHA
Plaintiff, :
v. :
JUNIPER NETWORKS, INC., a :
Delaware Corporation, :
Defendant. :

- - - - -x

HIGHLY CONFIDENTIAL SOURCE CODE - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF CHANDRA NAGARAJAN

Sunnyvale, California

Thursday, May 31, 2018

9:05 a.m.

Job No.: 189837

Pages: 1 - 245

Reported By: Charlotte Lacey, RPR, CSR No. 14224

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Transcript of Chandra Nagarajan

Conducted on May 31, 2018

33

1	adapters determine the threat level for the file, which	09:43:09
2	is the primary -- primary goal of this ATP product.	09:43:12
3	Q Have you heard of something called Joe static?	09:43:42
4	A That is a Joe static adapter also in the -- in	09:43:47
5	the -- in the series of analysis.	09:43:54
6	Q What does Joe static do?	09:43:54
7	A The Joe static is -- is a -- we have -- we	09:43:58
8	have a license and software from Joe Security, and then	09:44:01
9	it does the static analysis as -- as -- the adapter does	09:44:05
10	static analysis from the Joe Security product.	09:44:13
11	Q Do you know how Joe static works?	09:44:15
12	A I -- I don't know how Joe static works. We...	09:44:17
13	Q Have you heard of something called Joe	09:44:27
14	Sandbox?	09:44:31
15	A The Joe Sandbox is also the -- is a -- is a	09:44:31
16	dynamic analysis product from Joe Security, and we use	09:44:36
17	that as part of your product for dynamic analysis.	09:44:40
18	Q Do you know how does Joe Sandbox work?	09:44:44
19	A So we -- we -- we have not developed this Joe	09:44:47
20	Sandbox, so it's a licensed software. So I'm not fully	09:44:51
21	aware of how it works. But the idea -- the main idea is	09:44:54
22	to execute the file in the -- in an environment and	09:44:59
23	capture all the behaviors once it runs, and -- and	09:45:04
24	then -- and then capture all the behaviors, and based on	09:45:11
25	that, determine the threat level.	09:45:16

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Transcript of Chandra Nagarajan

Conducted on May 31, 2018

34

1 So it's really an isolated environment where 09:45:17
2 you're safe to execute a file and run a file and then 09:45:22
3 watch its behaviors and -- in a very dynamic fashion. 09:45:25

4 Q Is Joe Sandbox different from deception? 09:45:33

5 A Joe Sandbox, it is -- it is -- it is one and 09:45:38
6 the same. So what -- what we have done is there are -- 09:45:42
7 there are -- it's a third-party software. We have added 09:45:47
8 one or two functionalities there to -- to -- in that -- 09:45:50
9 during the dynamic analysis to watch for. And it's 09:45:57
10 really the same -- same -- same adapter. Deception 09:46:00
11 and -- is -- deception is just a -- an adapter that this 09:46:06
12 Joe Security runs. 09:46:11

13 Q What are the one or two functionalities that 09:46:12
14 are added? 09:46:16

15 A So I, again, I can give a representative one 09:46:16
16 or two, but it's a thing we should refer to the code to 09:46:20
17 do -- to check all the things. For example, we try to 09:46:26
18 insert a fake USB or something and see how the program 09:46:30
19 will behave if there is a USB in a dynamic fashion. So 09:46:36
20 that is one of the things that happen. I think there 09:46:41
21 are six or seven more things which -- which is like 09:46:44
22 that. 09:46:47

23 Q Can you describe the six or more things? 09:46:47

24 A I -- I can't -- I'm not able to recollect all 09:46:50
25 the six things. The whatever -- the one thing which I 09:46:54

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