

EXHIBIT 4

UNREDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

TranscriptLegend:

[U]: Unintelligible

[PH]: Phonetic

[NS]: Noise

[OV]: Overlapping Voices

[Recording Begins – 00:00:00]

Speaker ID	Time Code	Transcription
John	00:15	-- for making a decision about these things.
Scott	00:05	I appreciate that overture. Yeah, I mean actually, Ivan and I had a pretty good relationship. I don't know the circumstances of his departure but --
John	00:17	Okay.
Scott	00:18	-- so I don't really know what you're referring to, in terms of different styles. But I guess what you're saying is he was a heavier hammer, and you're a lighter hammer or something like that. But -- is that -- is that basically what you're saying?
John	00:32	I don't -- I don't know. I thought he was light -- I think I tend to just be kind of fact-based, and just trying to kinda cut to the chase. Yeah, I don't know. I have my own style. I've been doing this for 20 plus years. And I -- I just think there's a way to do it where two parties can be respectful and can exchange some information. And I'm not saying there's not gonna be a debate, or it might get heated here or there, but, you know, I think there's a way to exchange information, that you can make a -- each party can kinda make a decision about whether this is proceeding on a path that makes sense.
Scott	01:07	Well, I think if you -- you probably have access, at least, to the email trends -- correspondence that's gone back and forth. And I think one thing that can be said is that it has been respectful. It's been respectful in a disagreement way, but that's fine. And we'll continue to

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**Trial Exhibit 256**

		<p>have that dialogue, and I'm happy to have that dialogue with you.</p> <p>So are you -- is -- is Finjan just purely a licensing company now or do you actually make anything?</p>
John	01:39	There's some stuff we're making like a web browser for mobile and there's some other things that are in development.
Scott	01:44	But you're not suing us on those. You're not -- you're not asserting those patents, right?
John	01:49	Correct.
Scott	01:50	Okay. So you're non-practicing in terms of the patents that are being asserted.
John	01:56	Yes. I mean Finjan's got this -- I don't know if it's -- I thought Ivan might have gone through it. But I mean Finjan started in 1997. Finjan's now kind of -- some of Finjan is now buried under M86 Security. So it's kind of like been splintered and resold. So --
Scott	02:16	So did you have like a-- did you have a standards position?
John	02:22	I -- no, I have not. I don't want to cause any issues with standards or declarations of standards or anything like that.
Scott	02:27	So you -- you're not claiming you own a standard or have a position in a standard?
John	02:34	Correct.
Scott	03:35	Okay.
John	02:36	It's all implementation.
Scott	02:37	Yeah. So how much are you up to speed on -- on the previous dialogue between Juniper and Finjan?
John	02:46	I have not read it recently. I did review it at one time, and it looked like, you know, there was a debate over an NDA -- not an NDA. It's more like to kind of get to your process, in terms of how do you usually handle it. I mean Finjan is usually an NDA and a mutual stand-still agreement to allow the parties over some period of time that's agreed upon to have kind of a forthright exchange.
Scott	03:10	Yeah. So it -- so that's -- yeah, I think Ivan presented that to us, and we -- we declined to sign it. Basically,

		<p>what -- what the model we would like to employ is for you to share whatever information you think is relevant; a teaser or whatever you call it, to get us interested, to get us thinking that we should engage in a discussion with you, and then we will.</p> <p>But we're not necessarily going to commit to an NDA. We may, but that's not my call. So it's -- it's just a little bit of a kind of a dance here.</p>
John	03:55	<p>Okay. So I mean we have identified patents. We have identified products. I mean are you looking for -- do you really want like a formal letter of Notice of Infringement or are you -- what do you -- what do you call a teaser?</p>
Scott	04:09	<p>Well, you've identified -- well, let me -- I have to go back. I'm not going to acknowledge that you've identified patents and products. But with any specificity, I think it's been at a fairly high level. But I would have to go back and familiarize myself with that again.</p> <p>But I know you've provided some information. And we have reviewed that information, but it's been probably six months since we've heard from you, so I would have to go back and refresh my recollection.</p>
John	04:41	<p>I could just help you. We would just restart, 'cause, yeah, but I think that information's dated --</p>
Scott	04:47	<p>Okay.</p>
John	04:47	<p>-- you know, there's new patents, different patents and probably different products.</p>
Scott	04:53	<p>The products are probably not that different, but if you have new patents, then all right, we would love to hear about that.</p>
John	05:01	<p>Yes, so I mean the products that we're focused on is the -- the SRX Series, including the virtual firewall, and --</p>
Scott	05:10	<p>And why have you focused on that?</p>
John	05:12	<p>Because that's what the patents have led us to, I mean there's new security products, and so we don't think -- you know, really with your Junos operating system. But it looks like some of the modules that are supported in those products and the Next Generation firewall, which is your UTM, your antivirus, and your web filtering are three modules that we think about using three new</p>

		patents.
Scott	05:33	And how'd you get to that?
John	05:35	Claim charts.
Scott	05:37	Oh, no, no. Before you get to the claim chart part. So how did you -- Were you using like Juniper documentation or were you using engineers assessing the situation? What -- what were you using?
John	05:50	Our engineers looking at your product documentation.
Scott	05:55	So you have engineers?
John	05:55	Yes.
Scott	05:56	Okay. And they have networking and security backgrounds?
John	06:02	Correct.
Scott	06:06	And so, when you engage with other targets, you -- how do you like to engage? Do you like to present your engineers with the target's engineers and -- and have a dialogue or what do you -- what do you like to do?
John	06:24	<p>I'd do it any way you want. I mean we could -- we'd would be happy to come over and share, you know, our analysis and why we -- why we think the patents are being used and our -- our read on the specific products. You're welcome to include your engineers. That would be useful, if -- if that helps.</p> <p>I can share, you know, some of the success we've had in licenses and some of the background of the company, and we can go through where we see a possible solution or we can just wait, and, you know, we could stay in the technical realm and just wait for your feedback before we advance to that.</p> <p>The way we usually do it is, yeah, we never usually want it in an NDA. We really want your -- we don't want our information being in public -- publicly shared, and we don't think your information or responses or mailed information or something like that is also should be public.</p>
Scott	07:18	But the difficulty here is that your -- your engineers probably did not create the products. Is that correct?
John	07:27	Correct.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.