

EXHIBIT 19

**UNREDACTED VERSION OF
DOCUMENT SOUGHT TO BE
SEALED**

MICHAEL D. MITZENMACHER Highly Confidential
FINJAN V. JUNIPER NETWORKS

July 03, 2018

1

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Case No.: 3:17-cv-05659-WHA

FINJAN, INC., a Delaware Corporation,
Plaintiff,

V.

JUNIPER NETWORKS, INC., a Delaware
Corporation,
Defendant.

~~~~~

AUDIO-VISUAL DEPOSITION OF  
MICHAEL D. MITZENMACHER

\*\* HIGHLY CONFIDENTIAL \*\*

July 3, 2018

9:32 a.m.

Esquire Deposition Solutions  
50 Federal Street, 6th Floor  
Boston, Massachusetts

Kristin M. Kelley, RPR, CRR



800.211.DEPO (3376)  
EsquireSolutions.com



MICHAEL D. MITZENMACHER Highly Confidential  
FINJAN V. JUNIPER NETWORKS

July 03, 2018  
124

1 and ordinary meaning could benefit from 00:39:19  
2 explanation and I provide particular 00:39:21  
3 explanation in paragraphs 39 to 41. But in 00:39:29  
4 particular in paragraph 39 I point out that 00:39:32  
5 this term has been construed before with a 00:39:35  
6 construction adopted by multiple courts 00:39:38  
7 which I think really just clarifies what one 00:39:41  
8 would generally understand to be the plain 00:39:48  
9 and ordinary meaning. So I certainly kept 00:39:51  
10 that in mind in this context. 00:39:55  
11 Q. And that construction that you identified 00:39:57  
12 was performing a hashing function on the 00:40:00  
13 Downloadable together with its fetched 00:40:03  
14 components to generate a Downloadable ID, 00:40:08  
15 correct? 00:40:12  
16 MS. HEDVAT: Objection, form. 00:40:13  
17 A. Yeah. I think you might have missed a word. 00:40:13  
18 I think it's with its fetched software 00:40:17  
19 components, at least what I have in front of 00:40:19  
20 me, but otherwise I think that's right. 00:40:21  
21 Q. Okay. What does it mean to perform "a 00:40:23  
22 hashing function on the Downloadable 00:40:25  
23 together with its fetched software 00:40:27  
24 components" ? 00:40:33



800.211.DEPO (3376)  
Esquire Solutions.com

MICHAEL D. MITZENMACHER Highly Confidential  
FINJAN V. JUNIPER NETWORKS

July 03, 2018  
125

|    |                                                |          |
|----|------------------------------------------------|----------|
| 1  | A. I would say in general that depends on the  | 00:40:34 |
| 2  | context.                                       | 00:40:43 |
| 3  | Q. Does "together with" require it to occur at | 00:40:44 |
| 4  | the same time?                                 | 00:40:46 |
| 5  | A. No. I don't believe that's a specific       | 00:40:47 |
| 6  | requirement or I didn't see any timing         | 00:40:49 |
| 7  | requirement in the claim language.             | 00:40:51 |
| 8  | Q. Does it -- does "together with" require it  | 00:40:53 |
| 9  | to be the same type of hashing function?       | 00:40:58 |
| 10 | A. I would just add to the last answer,        | 00:41:01 |
| 11 | certainly together in time might be a way to   | 00:41:10 |
| 12 | achieve together with. I didn't want to        | 00:41:15 |
| 13 | suggest it wouldn't be related but it          | 00:41:16 |
| 14 | certainly wouldn't have to be the only way,    | 00:41:18 |
| 15 | sort of what I was thinking in that form.      | 00:41:20 |
| 16 | Q. Just before we move on to clarify. So, in   | 00:41:22 |
| 17 | other words, it wouldn't have to be --         | 00:41:25 |
| 18 | strike that.                                   | 00:41:27 |
| 19 | So, in other words, the hashing of the         | 00:41:28 |
| 20 | Downloadable and the fetched software          | 00:41:30 |
| 21 | components wouldn't have to occur at the       | 00:41:32 |
| 22 | same time in order for it to constitute        | 00:41:34 |
| 23 | "together with"?                               | 00:41:38 |
| 24 | MS. HEDVAT: Objection, form.                   | 00:41:39 |



800.211.DEPO (3376)

MICHAEL D. MITZENMACHER Highly Confidential  
FINJAN V. JUNIPER NETWORKS

July 03, 2018  
126

1 A. Right. I don't think it would have to be at 00:41:40  
2 the same time but that could certainly -- 00:41:42  
3 yeah. I don't think that's a requirement. 00:41:45  
4 I don't see a temporal requirement. 00:41:48  
5 Q. Okay. And so the second portion of that 00:41:50  
6 that I was asking about is whether "together 00:41:52  
7 with" would require performing the same type 00:41:55  
8 of hashing function on the Downloadable and 00:42:04  
9 the fetched software components? 00:42:07  
10 A. I think I need to you at least clarify what 00:42:12  
11 you mean by saying same type of hashing 00:42:15  
12 function. 00:42:17  
13 Q. We talked a little earlier about MD5 or 00:42:17  
14 SHA-256. Those are different types of 00:42:21  
15 hashing functions, right? 00:42:23  
16 MS. HEDVAT: Objection, form. 00:42:24  
17 A. I would say they're different hashing 00:42:25  
18 functions. I'm not exactly clear what you 00:42:27  
19 mean by different types. If you just want 00:42:30  
20 to say those are two different hash 00:42:35  
21 functions, I agree. 00:42:37  
22 Q. So does "together with" require that you use 00:42:38  
23 the same hashing function on the 00:42:41  
24 Downloadable and the fetched software 00:42:45



800.211.DEPO (3376)

# 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.