

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IRELL & MANELLA LLP

Jonathan S. Kagan (SBN 166039)
jkagan@irell.com
Joshua P. Glucoft (SBN 301249)
jglucoft@irell.com
Casey Curran (SBN 305210)
ccurran@irell.com
1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067-4276
Telephone: (310) 277-1010
Facsimile: (310) 203-7199

Rebecca L. Carson (SBN 254105)
rcarson@irell.com
Kevin Wang (SBN 318024)
kwang@irell.com
840 Newport Center Drive, Suite 400
Newport Beach, California 92660-6324
Telephone: (949) 760-0991
Facsimile: (949) 760-5200

Attorneys for Defendant
JUNIPER NETWORKS, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

FINJAN, INC.,

Plaintiff,

v.

JUNIPER NETWORKS, INC.,

Defendant.

) Case No. 3:17-cv-05659-WHA
)
) **DECLARATION OF JOSHUA GLUCOFT**
) **IN SUPPORT OF DEFENDANT JUNIPER**
) **NETWORKS, INC.’S OPPOSITION TO**
) **MOTION TO COMPEL**
)
)
) Hon. William H, Alsup

DECLARATION OF JOSHUA GLUCOFT

I, Joshua Glucoft, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Juniper Networks, Inc. in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice before this Court. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I submit this declaration in support of Juniper Networks, Inc.’s (“Juniper”) opposition to Finjan, Inc.’s (“Finjan”) Motion to Compel (Dkt. No. 48).

3. On March 19, 2018, Juniper produced its source code for the SRX, Sky ATP, and Space Security Director products. On March 7, 2018, Juniper produced more than 160,000 pages of technical documents related to these products.

4. Juniper expects to produce by April 14, 2018 approximately 7,000 additional pages of highly confidential technical documents, including design and development documents for Sky ATP, and substantially all of Juniper’s production of design and development documents for SRX and Space Security Director.

5. Juniper’s Sky ATP is a distinct product from the ATP Appliance. The source code that Juniper collected and produced for Sky ATP is different from the source code used in the ATP Appliance.

Executed this 13th day of April, 2018, at Los Angeles, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Joshua Glucoft

Joshua Glucoft