

EXHIBIT B

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Attorneys for Defendant
JUNIPER NETWORKS, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

FINJAN, INC., a Delaware Corporation,)	Case No. 3:17-cv-05659-WHA
)	
Plaintiff,)	JUNIPER NETWORKS, INC.'S
)	SECOND SET OF INTERROGATORIES
vs.)	DIRECTED TO FINJAN, INC.
)	(NOS. 11-14)
JUNIPER NETWORKS, INC., a Delaware)	
Corporation,)	
)	
Defendant.)	

PROPOUNDING PARTY: Defendant JUNIPER NETWORKS, INC.

RESPONDING PARTY: Plaintiff FINJAN, INC.

SET NO.: TWO

1 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and the Local Civil
2 Rules of this Court, Defendant Juniper Networks, Inc. (“Juniper”) hereby requests that Plaintiff
3 Finjan, Inc. (“Finjan”) answer in writing and under oath the following Second Set of Interrogatories
4 within thirty (30) days after service hereof in accordance with the following definitions and
5 instructions. Answers are to be signed and verified by the person making them and objections signed
6 by the attorney making them.

7 **DEFINITIONS AND INSTRUCTIONS**

8 Each of these definitions and instructions is incorporated into each of the interrogatories to
9 which it pertains.

10 1. The term “Complaint” means the Complaint For Patent Infringement and Demand
11 for Jury Trial filed by Finjan on September 29, 2017.

12 2. The term “Juniper” means Juniper Networks, Inc., the defendant in the above-
13 captioned matter.

14 3. “Patent” refers to any United States, international, or foreign classes or types of
15 patents, utility models, design patents, applications (including provisional applications), certificates
16 of invention, reissues, divisionals, continuations, continuations-in-part, extensions, renewals,
17 reexaminations and foreign counterparts thereof. The defined term “Patent” includes all stated
18 categories of intellectual property regardless of whether those rights are presently expired or were
19 ever adjudged invalid.

20 4. “Patent-in-Suit” or “Patents-in-Suit” shall mean any or all of the Asserted Patents
21 identified in Finjan’s Complaint filed on September 29, 2017, which are U.S. Patent No. 6,154,844,
22 U.S. Patent No. 6,804,780, U.S. Patent No. 7,647,633, U.S. Patent No. 7,613,926, U.S. Patent No.
23 8,141,154, U.S. Patent No. 8,677,494, and U.S. Patent No. 7,418,731.

24 5. The term “Asserted Claims” means the claims that Finjan is asserting in this case,
25 which include: Claims 1, 15, and 41 of the ’844 Patent; Claims 1 and 9 of the ’780 Patent; Claims
26 15 and 22 of the ’926 Patent; Claims 1, 8, 14, and 19 of the ’633 Patent; Claim 1 of the ’154 Patent;
27 Claims 10, 14, 16, and 18 of the ’494 Patent; and Claims 1 and 17 of the ’731 Patent.
28

1 6. The terms “You,” “Your,” “Finjan,” and “Plaintiff” mean Finjan, Inc., including
2 without limitation all of its corporate locations, and all predecessors, successors, subsidiaries,
3 parents, and affiliates, and all past or present directors, officers, agents, representatives, employees,
4 consultants, attorneys, entities acting in joint-venture or partnership relationships with Finjan, Inc.,
5 and others acting on Finjan’s behalf or on whose behalf Finjan has acted or is acting.

6 7. The term “prior art” means all information relating or potentially relating to the
7 patentability of the Patents-in-Suit, including patents, publications, prior inventions, facts and events
8 relating to prosecution proceedings for patent applications having common ownership or
9 inventorship with the application that led to the Patents-in-Suit, and all other prior art as defined in
10 35 U.S.C. §§ 102-103 and other applicable federal statutes and case law.

11 8. The term “person” refers to any natural person, firm, association, organization,
12 partnership, sole proprietorship, business trust, corporation or entity.

13 9. The term “communication” shall mean any conversation, discussion, letter,
14 memorandum, note, e-mail, voice mail, or other transfer of information, whether written, oral,
15 electronic, or by any other means, and includes any document or other medium which abstracts,
16 digests, records, or transcribes any such communication, or any subsequent review or discussion of
17 such communication, whether occurring at meetings or otherwise.

18 10. The terms “document” or “documents” are used herein in their customary broad
19 sense, and mean any kind of printed, recorded, written, graphic, or photographic matter (including
20 tape recordings), however printed, produced, reproduced, coded or stored, of any kind or
21 description, whether sent or received or not, including originals, copies, drafts, and both sides
22 thereof, and including papers, books, charts, graphs, photographs, drawings, correspondence,
23 telegrams, cables, telex messages, memoranda, notes, notations, work papers, routing slips, intra-
24 and inter-office communications, electronic mail, affidavits, statements, opinions, court pleadings,
25 reports, indices, studies, analyses, forecasts, evaluations, contracts, computer printouts, data
26 processing input and output, computer programs, microfilms, microfiche, all other records kept by
27 electronic, photographic, or mechanical means, and things similar to any of the foregoing, regardless
28 of their author or origin, of any kind.

1 11. The terms “and” and “or” are terms of inclusion and not of exclusion and are to be
2 construed either disjunctively or conjunctively as necessary to bring within the scope of these
3 interrogatories any information which might be construed to be outside their scope.

4 12. Nouns, whether singular or plural herein, shall be construed either as singular or
5 plural as necessary to bring within the scope of these interrogatories any information which might
6 otherwise be construed to be outside their scope.

7 13. The phrases “related to” or “relating to” mean refer to, concern, mention, reflect,
8 summarize, evidence, involve, describe, discuss, respond to, support, contradict, constitute, or
9 comment on, in whole or in part.

10 14. The phrase “Set Forth the Complete Basis” means to state the complete factual and
11 legal basis, if any, including without limitation by identifying any Documents and identifying any
12 persons with knowledge and the knowledge that You allege they possess.

13 15. The term “including” means “including without limitation,” as appropriate, so as to
14 bring within the scope of the interrogatory all responses that might otherwise be construed to be
15 outside of its scope. The term “all” means “any and all,” as appropriate.

16 16. The terms “identify” or “identity,” when used in connection with an individual
17 means: state the individual’s full name; his or her home and business address; his or her present
18 employer; his or her position, title, or job description; and, if employed by You, the individual’s
19 dates and regular places of employment, and general duties.

20 17. The terms “identify” or “identity,” when used in connection with a company,
21 corporation, association, partnership, joint venture, or any legal entity other than a natural person,
22 means: state its full name and type of organization or entity; the address of its principal place of
23 business; its date and place of incorporation; and identify its officers, directors, and managing
24 agents.

25 18. The terms “identify” or “identity,” when used in connection with an oral statement
26 mean: state the name of the speaker; the date of the statement; the place at which the statement was
27 made; the person or persons to whom the statement was addressed, if practicable, and otherwise a
28 general description of the persons to whom the statement was addressed; the subject matter of the

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