

EXHIBIT 2

Glucoft, Josh

From: Glucoft, Josh
Sent: Friday, March 16, 2018 3:40 PM
To: Kastens, Kris (KKastens@KRAMERLEVIN.com)
Cc: ~Andre, Paul; ~Kobialka, Lisa; ~Hannah, James; Kagan, Jonathan; Carson, Rebecca; Wang, Kevin; Holland, Eileen; ~Manes, Austin; Curran, Casey; ~Manes, Austin; ~Lee, Michael; #Juniper/Finjan [Int]
Subject: RE: Finjan v. Juniper - Discovery

Kris,

We are not sure what you mean by “indexed searching,” but UltraEdit has substantial searching capabilities, including but not limited to: “Search huge log files, generate a list of all lines containing your search string, do pattern-based find and replace with regular expression support, search in columns and selected text.” *See:* <https://www.ultraedit.com/products/ultraedit/ultraedit-feature-map/>. When Juniper has produced source code in the past, Juniper has provided UltraEdit as a search tool and it has always been sufficient to facilitate effective searching.

Separately, in order to make our meet-and-confer on Monday regarding third party confidentiality issues most effective, please let us know in advance which third parties’ confidential information may be covered by our requests and when you provided those third parties with notice.

Lastly, with respect to the potential deposition of Mr. Baltasar, thank you for the productive meet and confer yesterday, and thank you for confirming that Mr. Baltasar’s deposition is off calendar until the parties are able to determine whether and when his deposition will move forward. I can confirm that, as I mentioned on our call, Mr. Baltasar’s role is to support sales representatives for sales of Juniper products only in the Europe/Middle East/Africa region. Mr. Baltasar has not been involved in any of the development or engineering of Sky ATP or any of the other accused products (*e.g.*, did not write any of the code in those products). Additionally, Mr. Baltasar does not regularly travel to the U.S. and has no plans to travel to the U.S. Accordingly, we believe that bringing Mr. Baltasar all the way from the Netherlands is not proportional to the needs of the case, given that he has no unique knowledge of Sky ATP or any other accused product. Please confirm whether you are withdrawing your notice of deposition.

Thanks,
 Josh

From: Kastens, Kris [<mailto:KKastens@KRAMERLEVIN.com>]
Sent: Friday, March 16, 2018 10:56 AM
To: Glucoft, Josh <JGlucoft@irell.com>
Cc: ~Andre, Paul <pandre@kramerlevin.com>; ~Kobialka, Lisa <lkobialka@kramerlevin.com>; ~Hannah, James <jhannah@kramerlevin.com>; Kagan, Jonathan <JKagan@irell.com>; Carson, Rebecca <RCarson@irell.com>; Wang, Kevin <kwang@irell.com>; Holland, Eileen <EHolland@irell.com>; ~Manes, Austin <amanes@kramerlevin.com>; Curran, Casey <ccurran@irell.com>; ~Manes, Austin <amanes@kramerlevin.com>; ~Lee, Michael <mhlee@kramerlevin.com>
Subject: RE: Finjan v. Juniper - Discovery

Josh,

Can you confirm that UltraEdit performs indexed searching?

Sincerely,

Kris Kastens

Associate

Kramer Levin Naftalis & Frankel LLP
990 Marsh Road, Menlo Park, California 94025
T 650.752.1715 F 650.752.1815

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From: Glucoft, Josh [<mailto:JGlucoft@irell.com>]

Sent: Thursday, March 15, 2018 5:49 PM

To: Kastens, Kris

Cc: Andre, Paul; Kobialka, Lisa; Hannah, James; Kagan, Jonathan; Carson, Rebecca; Wang, Kevin; Holland, Eileen; Manes, Austin; Curran, Casey; Manes, Austin; Lee, Michael H.

Subject: [EXTERNAL] RE: Finjan v. Juniper - Discovery

Kris,

Thank you for confirming that you will abide by the terms of the Interim Model Protective Order.

With respect to the source code, we will produce it organized by directory and sub-directory so that you can easily navigate between different products and files. We will not make any modifications to the code relative to how it has been kept in the ordinary course of business, although the code will of course be read-only to prevent modification. We also will not create any additional files, including any dummy files or additional index, that are not part of the existing codebase.

As for review tools, we will provide NotePad++, Vim, Emacs, and Grep, as you have requested. We will also provide UltraEdit, which includes substantial searching capabilities. These tools will allow you to reasonably review and search the entire codebase. We are not, however, going to provide tools that could compromise the integrity of the code by facilitating writing to the code, changing file permissions, or connecting the secured computer to a network. For that reason, we are not going to provide Cygwin or Coreutils or enable the Windows CLI.

We will provide Microsoft's read-only viewers for Word, Excel, and PowerPoint, and you may take notes on the review tools that we have provided, such as Notepad++. We are not, however, going to provide the versions of Microsoft Office that allow macros, as those versions present a security concern. Please remember that per the terms of the Interim Model Protective Order, you may not copy, remove, or otherwise transfer any portion of the source code, which precludes copying the source code into a note-taking application. If you would like us to print out any electronic notes that you take, we would be happy to do so provided that we determine the notes do not contain any embedded copies of the source code.

Best,
Josh

From: Kastens, Kris [<mailto:KKastens@KRAMERLEVIN.com>]

Sent: Wednesday, March 14, 2018 2:11 PM

To: Glucoft, Josh

~Manes, Austin; Curran, Casey; ~Manes, Austin; ~Lee, Michael

Subject: RE: Finjan v. Juniper - Discovery

Josh,

Finjan agrees that the Interim Model Protective Order is in place for this case until the parties finalize a protective order. Please let us know who to ask for at the front desk when we arrive.

We also request that the source code be indexed for searching, that the Windows command line be enabled, and MSOffice or OpenOffice installed. In addition, we request the appropriate tools be installed to review the source code. The links to download these tools can be found here:

- <https://notepad-plus-plus.org/download/>
- <http://www.cygwin.com/>
- <http://www.gnu.org/software/emacs/>
- <http://www.vim.org/>
- <http://www.gnu.org/software/grep/>
- <http://www.gnu.org/software/coreutils/>

Sincerely,
Kris

Kris Kastens

Associate

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From: Glucoft, Josh [<mailto:JGlucoft@irell.com>]

Sent: Tuesday, March 13, 2018 2:58 PM

To: Kastens, Kris

Cc: Andre, Paul; Kobialka, Lisa; Hannah, James; Kagan, Jonathan; Carson, Rebecca; Wang, Kevin; Holland, Eileen; Manes, Austin; Curran, Casey; Manes, Austin; Lee, Michael H.; #Juniper/Finjan [Int]

Subject: [EXTERNAL] RE: Finjan v. Juniper - Discovery

Kris,

Finjan chose to serve its infringement contentions on the last day possible, March 8. Until Finjan chose to serve its infringement contentions (and even still), Juniper was left largely guessing as to what functionality in the accused products is actually at issue. Nonetheless, we have offered to make the source code available for review just 11 days after Finjan served its infringement contentions, which demonstrates Juniper's diligence. Please confirm that for the review starting this Monday, March 19, Finjan agrees to abide by the terms of the Interim Model Protective Order pending finalization of the parties' stipulated protective order. Assuming Finjan agrees, the review may begin each day next week at 9:00 a.m. and continue until 5:00 p.m., with a break for lunch to accommodate our proctor.

We will respond to the remainder of the issues in your email in due course.

Thanks,
Josh

From: Kastens, Kris [<mailto:KKastens@KRAMERLEVIN.com>]

Sent: Monday, March 12, 2018 3:42 PM

To: Glucoft, Josh

Cc: ~Andre, Paul; ~Kobialka, Lisa; ~Hannah, James; Kagan, Jonathan; Carson, Rebecca; Wang, Kevin; Holland, Eileen; ~Manes, Austin; Curran, Casey; ~Manes, Austin; ~Lee, Michael

Subject: RE: Finjan v. Juniper - Discovery

Josh,

Thank you for confirming that the source code is available for inspection on March 19th. While this leaves little time for Finjan to review the code before claim selection, Finjan identifies Michael Lee and Kris Kastens as reviewing the code on March 19th-20th. Furthermore, we disagree that Juniper can make this production contingent on Finjan's production of certain unrelated material by March 19th. Finjan requested production of Juniper's source code, which is relevant, since the day after Judge Alsup ordered that the "shootout" procedure for this case. As such, Finjan will proceed with a review on March 19th as indicated.

In regards to the documents that Juniper is requesting, Finjan will serve its objections and responses to Juniper's Requests for Production in due course. However, as a showing of good faith, Finjan can agree to start producing the following on a rolling basis beginning on March 19th:

- Documents showing marking;
- Non-confidential invalidity contentions addressed to asserted patents;
- Non-confidential expert reports; and
- Deposition transcripts of Finjan employees that do not include third party confidential information.

We note that some of this was already produced, as some of it is part of the file history of the asserted patents. In regards to the other material requested, production by March 19th is impossible, as much the majority of these documents were marked confidential by a third party. Let us know when you are available to meet and confer on the scope of these requests.

To the extent that Juniper is alleging that Finjan's production has been deficient, Finjan has already produced tens of thousands of pages of its highly confidential documents (including documents showing marking with the patents), first with its initial disclosures and then more with its infringement contentions. Finjan has also already made its source code available for inspection under the interim protective order.

Sincerely,
Kris

Kris Kastens
Associate

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