

EXHIBIT 1

From: Williams, Daniel
Sent: Friday, June 14, 2019 11:52 AM
To: Carson, Rebecca
Cc: Kastens, Kris; Kobialka, Lisa; Andre, Paul; Hannah, James; Glucoft, Josh; Heinrich, Alan; Holland, Eileen; Isaac, Shawana; Kagan, Jonathan; Manzano, Jim; Mittleman, Harry; Quarnstrom, Brian; Theilacker, Leah; Wang, Kevin; Petersen, Ingrid
Subject: Follow-Up on Lead Counsel Meet and Confer

Rebecca,

We write confirming points discussed and following up on a few items from the lead counsel meet and confer last Friday regarding the various issues raised in Juniper's letters.

With respect to our discussion of the Interrogatories, Finjan will supplement its responses to the extent there is anything to add or update. For example, we will supplement Interrogatory No. 1 to reflect a recent license agreement and Interrogatory No. 5 regarding the '731 Patent. With respect to our discussion of Finjan's responses to Juniper's requests for production, we will confirm in writing that documents have been produced (i.e., in response to, for example, Request Nos. 3 and 6). You agreed that Juniper would not make any allegations regarding compliance with Judge Alsup's various orders regarding responding to written discovery.

Also, as promised, here are the non-privileged/ work product documents that were requested that contain third party confidential information and have been designated as confidential. Infringement contentions are in: (1) the two Blue Coat lawsuits, (2) Check Point, (3) FireEye, (4) Eset, (5) Palo Alto Networks, (6) Proofpoint, (7) Rapid7, (8) Sophos, (9) Symantec, (10) SonicWall, and (11) Zscaler. Invalidity contentions marked with confidentiality are in: (1) Bitdefender, (2) Cisco, (3) Check Point, (4) Sophos, and (5) SonicWall. We confirmed during the call that there are no additional documents to produce for Request Nos. 17-20 related to inventorship, Request Nos. 34-36 related to prosecution, and Request Nos. 25-26 related to research reports on products Finjan sold. We will confirm whether there are any non-privileged/ work product documents responsive to the discussion we had regarding Request for Production Nos. 8-12. We have been searching and thus far, we have not located any such documents. We stated that Juniper's request for documents related to Finjan's breach of contract case against Trustwave are not relevant and we will not produce such documents.

Separately, as we discussed on the call (and we subsequently confirmed), Finjan sent emails to nearly 30 third parties notifying them that Juniper's Requests for Production sought their confidential information. We confirmed that these emails went to Finjan's licensees, parties from other Finjan litigations and companies seeking to discuss Finjan's patent portfolio. These emails were sent around March/April of 2018, shortly after receiving Juniper's Requests. Juniper was included on those emails so that it could engage with the third parties about the scope and the terms of any production of their confidential information. Subsequently, Juniper did engage with many of these third parties about the scope of Juniper's Requests, and negotiated the scope of production and certain confidentiality terms with them as a condition of obtaining their consent to production. For example, in response to McAfee's concerns about the breadth and burden of reviewing responsive documents, Juniper narrowed its requests to McAfee. To the extent Juniper seeks email communications between Finjan and any third parties, Finjan stated in its responses that these are subject to Juniper's ESI requests and subject to third party permission, the terms of which are in the process of being finalized. To the extent that Juniper negotiated with any third parties and did not provide us with the communications, you will need to let us know.

Additionally, we discussed constructive notice, as Finjan is not alleging constructive notice for the upcoming trial. You stated you wanted to think about it and get back to us. Let us know what Juniper's position is on this issue.

Finally, we discussed the search tools for the source code computer, which we were not able to resolve and is the subject of briefing to the Court.

Regards,
Dan

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Bio

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