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12 JUNIPER NETWORKS, INC.

13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 FINJAN, INC., a Delaware Corporation,) Case No. 3:17-cv-05659-WHA
18)
18 Plaintiff,) **DECLARATION OF JOSHUA GLUCOFT**
19) **IN SUPPORT OF DEFENDANT JUNIPER**
19 vs.) **NETWORKS, INC.’S OPPOSITION TO**
20) **MOTION FOR AN ORDER**
20 JUNIPER NETWORKS, INC., a Delaware) **SHORTENING TIME**
21 Corporation,)
21 Defendant.)
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23 _____)

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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 for an Order Shortening Time (“motion to shorten time”) (Dkt. No. 68).

3. Attached as Exhibit A to Juniper’s Opposition to Finjan’s motion to shorten time is a true and correct copy of email exchanges between Julie Mar-Spinola, Finjan’s Chief Intellectual Property Officer, and Meredith McKenzie, Juniper’s Deputy General Counsel, from October 2017.

4. Attached as Exhibit B to Juniper’s Opposition to Finjan’s motion to shorten time is a true and correct copy of a March 15, 2018 email that I sent to Kris Kastens of Kramer Levin Naftalis & Frankel LLP, counsel for Finjan.

5. 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. On April 13, 2018, Juniper produced approximately 7,000 additional pages of highly confidential technical documents related to these products, including design and development documents for Sky ATP, and substantial portions of Juniper’s production of design and development documents for SRX and Space Security Director.

6. Juniper expects to produce thousands of additional pages of highly confidential technical documents related to the SRX, Sky ATP, and Space Security Director products by the end of April 2018.

7. 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.

