

Exhibit 2

From: Joseph Gratz <JGratz@durietangri.com>
Sent: Friday, March 15, 2019 8:12 AM
To: Andre, Paul; Kobialka, Lisa; Hannah, James; Kastens, Kris; Manes, Austin
Cc: Sonal Mehta; Andrew Perito; Josh Furman
Subject: [EXTERNAL] Finjan v. Zscaler, Case No. 3:17-cv-06946-JST

Counsel:

We have received your Second Amended Infringement Contentions.

In its most recent Order regarding contentions, the Court held that Finjan's identification of "a multiplicity of possible . . . internet applications . . . that could potentially meet the claim elements[]" is not sufficiently specific to put Zscaler on notice of Finjan's infringement contentions." ECF No. 110 at 8.

In its Second Amended Infringement Contentions, with respect to the "internet application" of the claims, Finjan states that:

The Internet application is the SME proxy software application that processes the content to send the content to the user. The Internet application is also a web browser, email client, or FTP client application running on the client device.

Appendix C-1 at 2. Finjan's other contentions with respect to the '305 Patent contain similar language with respect to a piece of Zscaler software and a broad category of potential accused third-party software.

The Court ordered Finjan to do more than "identify only broad categories of potential accused components," ECF No. 110 at 9, and thus we understand Finjan not to be identifying any web browser, email client, or FTP client application as being the "internet application" of the claims, but instead understand Finjan to be identifying the combination of the identified Zscaler software and any web browser, email client, or FTP client application as being the "internet application" of the claims. Based on that understanding, Zscaler is not filing a further motion to enforce the Court's order regarding this issue. However, if that understanding is incorrect, please let us know so that we can raise the issue with the Court.

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