

# EXHIBIT 6

1 PAUL ANDRE (SBN 196585)  
 2 pandre@kramerlevin.com  
 3 LISA KOBIALKA (SBN 191404)  
 4 lkobialka@kramerlevin.com  
 5 JAMES HANNAH (SBN 237978)  
 6 jhannah@kramerlevin.com  
 7 KRAMER LEVIN NAFTALIS & FRANKEL LLP  
 8 990 Marsh Road  
 9 Menlo Park, CA 94025  
 10 Telephone: (650) 752-1700  
 11 Facsimile: (650) 752-1800

12 Attorneys for Plaintiff  
 13 FINJAN, INC.

14 **IN THE UNITED STATES DISTRICT COURT**  
 15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
 16 **OAKLAND DIVISION**

17 FINJAN, INC.,

18 Plaintiff,

19 v.

20 QUALYS INC.,

21 Defendant.

Case No.: 4:18-cv-07229-YGR

**FINJAN, INC.’S FIRST SET OF  
 INTERROGATORIES TO DEFENDANT  
 QUALYS INC. (NOS. 1-6)**

1 Asserted Patents, the identity of all persons with knowledge of such facts and circumstances, and the  
2 identity of all documents reflecting such facts and circumstances.

3 **INTERROGATORY NO. 2:**

4 For each of the Accused Instrumentalities, identify all releases or versions that are or have been  
5 made, used, offered for sale, sold in the United States, or imported into the United States by You or on  
6 Your behalf from the year 2013 to the present.

7 **INTERROGATORY NO. 3:**

8 Describe in detail the revenue, sales, billings, pricing, costs, gross profits, net profits, and  
9 market share of each of the Accused Instrumentalities from the year 2013 to the present generated (a)  
10 in the United States and separately, (b) worldwide, including but not limited to identifying on a  
11 monthly, quarterly, and annual basis the gross and net revenues and gross and net profits generated by  
12 each of the Accused Instrumentalities, as well as the costs and expenses incurred by You in generating  
13 such revenue and profits.

14 **INTERROGATORY NO. 4:**

15 For the source code that You produced or made available for inspection or will produce and  
16 make available for inspection, identify the Accused Instrumentalities that correspond to the source  
17 code including the name and version number of each Accused Instrumentalities, the directories and  
18 subdirectories of the source code corresponding to the active source code incorporated into each of the  
19 Accused Instrumentalities, the last date the source code was modified for each of the products, which  
20 portion, if any, of the source code You contend is not active in the Accused Instrumentalities, and  
21 which portion, if any, of the source code You contend is prior art to the Asserted Patents.

22 **INTERROGATORY NO. 5:**

23 Describe in detail the geographic location(s) where the Accused Instrumentalities and their  
24 components were and are developed, tested, manufactured, used and updated since the date  
25 development began through the present, including the name(s) and address(es) of the location(s), the  
26 name(s) of the entity or entities involved in such activities, and if different components are developed,  
27  
28

1 tested, manufactured or updated in different locations, identify which components are developed,  
2 tested, manufactured or updated at each location and by whom.

3 **INTERROGATORY NO. 6:**

4 Since the date of first sale, identify the amount of both actual and forecasted sales of each  
5 model, version, or release of each of the Accused Instrumentalities, including by the following: (1)  
6 gross and net revenues, (2) gross and net profits, (3) research and development costs, (4) other  
7 costs/expenses, (5) sales prices, (6) number of units, (7) number of users, and (8) amount of foregoing  
8 that You contend are subject to 28 U.S.C. § 1498, and describe in detail how the foregoing (1-8) was  
9 calculated, including identification of persons, electronic databases, and documents who are  
10 knowledgeable or contain information regarding the foregoing.

11  
12  
13 Dated: March 1, 2019

By: /s/ Lisa Kobialka  
Paul J. Andre (State Bar. No. 196585)  
Lisa Kobialka (State Bar No. 191404)  
James Hannah (State Bar No. 237978)  
KRAMER LEVIN NAFTALIS  
& FRANKEL LLP  
990 Marsh Road  
Menlo Park, CA 94025  
Telephone: (650) 752-1700  
Facsimile: (650) 752-1800  
[pandre@kramerlevin.com](mailto:pandre@kramerlevin.com)  
[lkobialka@kramerlevin.com](mailto:lkobialka@kramerlevin.com)  
[jhannah@kramerlevin.com](mailto:jhannah@kramerlevin.com)

**PROOF OF SERVICE**

I, Sean Robertson, am employed in the Menlo Park, California office of Kramer Levin Naftalis & Frankel LLP. I am over the age of 18 and not a party to the within action. My business address is 990 Marsh Road, Menlo Park, California 94025. I am readily familiar with the firm’s practice of collecting and processing of mail for mailing with the U.S. Postal Service and overnight delivery services.

On March 1, 2019, I caused the following document(s) to be served:

**FINJAN, INC.’S FIRST SET OF INTERROGATORIES TO DEFENDANT  
QUALYS, INC. (NOS. 1-6)**

by electronic mail, addressed as follows:

Edward G. Poplawski  
Olivia M Kim  
Wilson Sonsini Goodrich & Rosati, P.C.  
633 West Fifth Street, Suite 1550  
Los Angeles, CA 90071  
[epoplawski@wsgr.com](mailto:epoplawski@wsgr.com)  
[okim@wsgr.com](mailto:okim@wsgr.com)

Ryan R. Smith  
Christopher Don Mays  
Wilson Sonsini Goodrich & Rosati  
650 Page Mill Road  
Palo Alto, CA 94304-1050  
[rsmith@wsgr.com](mailto:rsmith@wsgr.com)  
[cmays@wsgr.com](mailto:cmays@wsgr.com)

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 1, 2019, in Menlo Park, California.

\_\_\_\_\_  
Sean Robertson