

1 PAUL J. ANDRE (State Bar No. 196585)
 2 pandre@kramerlevin.com
 3 LISA KOBIALKA (State Bar No. 191404)
 4 lkobialka@kramerlevin.com
 5 JAMES HANNAH (State Bar No. 237978)
 6 jhannah@kramerlevin.com
 7 AUSTIN MANES (State Bar No. 284065)
 8 amanes@kramerlevin.com
 9 KRAMER LEVIN NAFTALIS & FRANKEL LLP
 10 990 Marsh Road
 11 Menlo Park, CA 94025
 12 Telephone: (650) 752-1700
 13 Facsimile: (650) 752-1800

14 *Attorneys for Plaintiff*
 15 FINJAN, INC.

16 **IN THE UNITED STATES DISTRICT COURT**
 17 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 18 **OAKLAND DIVISION**

19 FINJAN, INC.,

20 Plaintiff,

21 v.

22 QUALYS INC.,

23 Defendant.

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

**DECLARATION OF AUSTIN MANES IN
 SUPPORT OF PLAINTIFF FINJAN, INC.'S
 REPLY CLAIM CONSTRUCTION BRIEF**

Date: May 1, 2020
 Time: 10:00 AM
 Place: Courtroom 1, 4th Floor
 Before: Hon. Yvonne Gonzalez Rogers

1 I, Austin Manes, declare:

2 1. I am an attorney with the law firm Kramer Levin Naftalis & Frankel LLP, counsel of
3 record for Finjan, Inc. (“Finjan”). I have personal knowledge of the facts stated herein and can testify
4 competently to those facts. I make this declaration in support of Plaintiff Finjan’s Reply Claim
5 Construction Brief.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of pages 33-37 from the document
7 titled “Joint Claim Construction Brief (Terms 1-20),” filed on October 25, 2019 in the matter *Finjan,*
8 *Inc. v. Rapid7, Inc.*, Case No. 18-cv-01519-MN (D. Del.).

9 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the Microsoft
10 Computer Dictionary, Fifth Edition, copyright 2002.

11 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the Dictionary of
12 Computing, Fourth Edition, copyright 2002.

13 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the book titled
14 “Computer Networks” by Andrew S. Tanenbaum, Fifth Edition, copyright 2011.

15
16 I declare under penalty of perjury under the laws of the United States of America that the
17 foregoing is true and correct. Executed on April 6, 2020 in San Francisco, California.

18
19 /s/ Austin Manes
Austin Manes

20
21
22 **ATTESTATION PURSUANT TO L.R. 5-1(I)**

23 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document
24 has been obtained from any other signatory to this document.

25
26 /s/ James Hannah
James Hannah