

QUALYS EXHIBIT B

Gordnia, Talin

From: Karineh Khachatourian <karinehk@rimonlaw.com>
Sent: Sunday, April 5, 2020 7:57 PM
To: Williams, Daniel; dhonda@barracuda.com
Cc: Frankel, Aaron; Gordnia, Talin; Mays, Christopher; Smith, Ryan; Poplawski, Edward
Subject: RE: Finjan v. Qualys, Case No. 18-cv-07229-YGR - Request for Protected Materials

[External]

So long as the documents are marked as AEO BNI has no objection. Thank you.

From: Williams, Daniel
Sent: Tuesday, March 31, 2020 5:10 PM
To: Karineh Khachatourian ; dhonda@barracuda.com
Cc: Frankel, Aaron ; Gordnia, Talin ; Mays, Christopher ; Smith, Ryan ; Poplawski, Edward
Subject: Finjan v. Qualys, Case No. 18-cv-07229-YGR - Request for Protected Materials

Counsel,

Defendant Qualys served Finjan with discovery requests in the matter *Finjan, Inc. v. Qualys Inc.*, Case No. 18-cv-07229-YGR (N.D. Cal.), in which Qualys seeks the production of documents that may contain the confidential information of your client, Barracuda. *See, e.g.*, Qualys' Request for Production No. 24 (attached). By way of preview, the documents sought by Qualys generally include licensing/settlement negotiations. We request that you reach out separately to Qualys' counsel (copied here) to reach agreement as to the scope of documents that your client consents to be produced and to resolve any objections.

Let us know within 14 days from today if your client objects to the production of the requested confidential information. *See* Protective Order, section 11(c) (attached). Unless we receive a response within that time period, Finjan will move forward with the production.

Kind regards,
Dan

Daniel Williams
Associate

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