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9 *Attorneys for Defendant*
10 QUALYS INC.

11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
13 **OAKLAND DIVISION**

14 FINJAN LLC, a Delaware Limited Liability)
15 Company,)
16 Plaintiff,)
17 v.)
18 QUALYS INC., a Delaware Corporation,)
19 Defendant.)

CASE NO.: 4:18-cv-07229-YGR (TSH)
DECLARATION OF
CHRISTOPHER D. MAYS IN
SUPPORT OF DEFENDANT
QUALYS INC.'S MOTION TO
STRIKE
Judge: Hon. Yvonne Gonzalez
Rogers
Date: December 8, 2020
Time: 2:00pm
Location: Zoom Teleconference¹

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¹ Per the Court's Notice regarding Civil Law and Motion Calendars and its Order at D.I. 48

1 I, Christopher D. Mays, the undersigned, declare as follows:

2 1. I am an attorney at law, duly licensed to practice before all the courts of the State of
3 California, and I am an associate with the law firm of Wilson Sonsini Goodrich & Rosati, counsel
4 for Defendant Qualys Inc. (“Qualys”). I submit this declaration in support of Defendant Qualys
5 Inc.’s Motion to Strike Plaintiff Finjan LLC’s Infringement Contentions.
6

7 2. Attached as **Exhibit 1** is a true and correct copy of *Finjan, Inc. v. Juniper Networks,*
8 *Inc.*, No. 2019-2405 (Fed. Cir. October 9, 2020).

9 3. Attached as **Exhibit 2** is a true and correct copy of Qualys’s Proposed Constructions,
10 sent via email October 23, 2019.
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12 4. Attached as **Exhibit 3** is a true and correct copy of Qualys Inc.’s Preliminary
13 Disclosure of Intrinsic and Extrinsic Evidence, dated November 6, 2019.
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15 5. Attached as **Exhibit 4** is a true and correct copy of a letter I wrote to Lisa Kobialka,
16 Finjan’s counsel of record at the time, dated July 23, 2020.

17 6. Attached as **Exhibit 5** is a true and correct copy of a letter I received from Kris
18 Kastens, Finjan’s counsel of record at the time, dated August 13, 2020.
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20 7. Attached as **Exhibit 6** is a true and correct copy of a Qualys Source Code Review
21 Log dated September 10-12, 2019.

22 8. Attached as **Exhibit 7** is a true and correct copy of a Qualys Source Code Review
23 Log dated October 1-4, 2019.
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25 9. Attached as **Exhibit 8** is a true and correct copy of a Qualys Source Code Review
26 Log dated January 31, 2020, February 5-6, 2020.

27 10. Attached as **Exhibit 9** is a true and correct copy of a Qualys Source Code Review
28 Log dated February 11-14, 2020.

