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15 *Attorneys for Plaintiff*
FINJAN LLC

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 (OAKLAND DIVISION)

19 FINJAN LLC, a Delaware Limited Liability
20 Company,

21 Plaintiff,

22 v.

23 QUALYS INC., a Delaware Corporation,

24 Defendant.
25

Case No. 4:18-cv-07229-YGR (TSH)

Hon. Yvonne Gonzalez Rogers

**DECLARATION OF MEGAN A.
CHACON IN SUPPORT OF FINJAN
LLC'S OPPOSITION TO DEFENDANT
QUALYS INC.'S MOTION FOR
JUDGMENT ON THE PLEADINGS**

26
27
28 DECLARATION OF MEGAN A. CHACON ISO

1 I, Megan A. Chacon, hereby declare and state as follows:

2 1. I am a principal in the law firm of Fish & Richardson P.C., counsel of record for
3 Plaintiff Finjan LLC in the above-captioned matter. I have personal knowledge of all the facts
4 contained herein and, if called as a witness, I could and would testify competently thereto.

5 2. Attached as Exhibit A is a true and correct copy of an excerpt from the *Ex Parte*
6 Reexamination Proceeding file of United States Patent No. 7,975,305, Reference No. 90014477.

7 3. Attached as Exhibit B is a true and correct copy of an excerpt from the *Ex Parte*
8 Reexamination Proceeding file of United States Patent No. 7,975,305, Reference No. 90014535.

9 4. Attached as Exhibit C is a true and correct copy of an excerpt from Plaintiff Finjan,
10 Inc.'s Objections and Responses to Defendant Qualys, Inc.'s Third Set of Interrogatories (Nos. 10-
11 12), dated August 12, 2020.

12 5. Attached as Exhibit D is a true and correct copy of IPR2017-01738, Paper No. 57,
13 Final Written Decision in *ESET, LLC and ESET spol s.r.o. v. Finjan, Inc.* dated January 24, 2019
14 (FINJAN-QUALYS 318370 – FINJAN-QUALYS 318420).

15 6. Attached as Exhibit E is a true and correct copy of an excerpt from the prosecution
16 history of United States Patent No. 7,975,305.

17 7. Attached as Exhibit F is a true and correct copy of an excerpt from the *Ex Parte*
18 Reexamination Proceeding file of United States Patent No. 7,975,305, Reference No. 90013660.

19 I declare under the penalty of perjury of the laws of the United States of America that the
20 foregoing is true and correct. Executed on November 5, 2020, in San Diego, California.

21
22 By: /s/ Megan Chacon
23 Megan A. Chacon (CA SBN 304912)
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