

# EXHIBIT C

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 11 FINJAN, INC.

12 **UNITED STATES DISTRICT COURT**  
 13 **NORTHERN DISTRICT OF CALIFORNIA**  
 14 **OAKLAND DIVISION**

15 FINJAN, INC., a Delaware Corporation,  
 16  
 17 Plaintiff,  
 18 v.  
 19 QUALYS, INC., a Delaware Corporation,  
 20 Defendant.

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

**PLAINTIFF FINJAN, INC.’S OBJECTIONS  
 AND RESPONSES TO DEFENDANT  
 QUALYS, INC.’S THIRD SET OF  
 INTERROGATORIES (NOS. 10-12)**

1 Pursuant to Fed. R. Civ. P. 26 and 33, Plaintiff Finjan, Inc. (“Finjan” or “Plaintiff”) responds to  
2 Defendant, Qualys, Inc.’s (“Qualys” or “Defendant”) Third Set of Interrogatories Nos. 10-12  
3 (“Interrogatories”). Finjan makes these objections and responses herein (collectively “Responses”)  
4 based on its current knowledge, understanding, and belief as to the facts and information reasonably  
5 available to it as of the date of the Responses.

6 Additional discovery and investigation may lead to additions to, changes in, or modifications of  
7 these Responses. The Responses, therefore, are given without prejudice to Finjan’s right to  
8 supplement these Responses pursuant to Fed. R. Civ. P. 26(e), or to provide subsequently discovered  
9 information and to introduce such subsequently discovered information at the time of any trial or  
10 proceeding in this action.

11 **GENERAL OBJECTIONS**

12 1. Finjan hereby incorporates by reference each and every general objection set forth  
13 below into each and every specific Response. From time to time, a specific Response may repeat a  
14 general objection for emphasis or for some other reason. The failure to include a general objection in a  
15 specific Response shall not be interpreted as a waiver of that general objection to that Response.

16 2. Finjan objects to each and every Interrogatory, Definition, and Instruction to the extent  
17 that they are vague, ambiguous, unintelligible, or compound.

18 3. Finjan objects to each and every Interrogatory, Definition, and Instruction to the extent  
19 that they are overly broad, unduly burdensome, seek information not relevant to the claim or defense of  
20 any party, and are not proportional to the needs of this case.

21 4. Finjan objects to each and every Interrogatory, Definition, and Instruction to the extent  
22 that they are not reasonably calculated to lead to the discovery of admissible information.

23 5. Finjan objects to each and every Interrogatory, Definition and Instruction to the extent  
24 they are not reasonably calculated to lead to the discovery of admissible evidence because they are not  
25 properly limited in time.

1           6.       Finjan objects to each and every Interrogatory, Definition, and Instruction to the extent that  
2 they are unduly burdensome and oppressive, to the extent they subject Finjan to unreasonable and undue  
3 effort or expense.

4           7.       Finjan objects to each and every Interrogatory, Definition, and Instruction to the extent that  
5 they seek information beyond Finjan's actual knowledge, custody, or control.

6           8.       Finjan objects to each and every Interrogatory, Definition, and Instruction to the extent they  
7 are unreasonably cumulative or duplicative.

8           9.       Finjan objects to each and every Interrogatory, Definition, and Instruction to the extent they  
9 seek information that is obtainable from some other source that is more convenient, less burdensome, or  
10 less expensive.

11          10.       Finjan objects to each and every Interrogatory, Definition, and Instruction to the extent that  
12 they seek information within Defendant's possession, custody or control.

13          11.       Finjan objects to each and every Interrogatory, Definition, and Instruction to the extent they  
14 seek information in the public domain, information equally available to Defendant from another source  
15 and/or information that can be obtained more efficiently by Defendant through other means of discovery.  
16 Defendant can ascertain such information from its own records or from other sources at least as readily as  
17 Finjan.

18          12.       Finjan objects to each and every Interrogatory, Definition, and Instruction to the extent that  
19 they seek confidential, business, financial, proprietary or sensitive information, or trade secrets of third  
20 parties, which may be subject to pre-existing protective order(s) and/or confidentiality agreements or in  
21 which any third party has an expectation of privacy. Such information shall not be provided absent an  
22 express order to the contrary from a court of competent jurisdiction, or an authorization from the third party  
23 having the interest in the information's confidentiality.

1           13.     Finjan objects to each and every Interrogatory, Definition, and Instruction to the extent they  
2 seek information protected by the attorney-client privilege, the work product doctrine, or any other  
3 applicable law, privilege, doctrine or immunity. Finjan will not disclose any information so protected, and  
4 the inadvertent disclosure or identification of any such information is not intended as, and will not  
5 constitute, a waiver of such privilege, doctrine, or immunity.

6           14.     Finjan objects to each and every Interrogatory, Definition, and Instruction to the extent they  
7 call for a legal conclusion. Finjan's responses shall not be construed as providing legal conclusions  
8 concerning the meaning or application of any terms used in Defendant's Interrogatories.

9           15.     Finjan objects to each and every Interrogatory, Definition, and Instruction to the extent that  
10 they are premature, as they seek information that is set to be disclosed on scheduled dates directed by the  
11 Court or the Northern District of California Patent Local Rules.

12           16.     Finjan objects to each and every Interrogatory, Definition, and Instruction as premature to  
13 the extent they seek information that will be the subject of expert testimony.

14           17.     Finjan objects to each and every Interrogatory, Definition, and Instruction to the extent that  
15 they impose obligations inconsistent with the stipulated protective order (Dkt. 34) or stipulated ESI order  
16 (Dkt. 37), or any other order to be entered in this case.

17           18.     Finjan objects to each and every Interrogatory, Definition, and Instruction to the extent they  
18 assume or mischaracterize any facts. Finjan's responses shall not be construed as agreeing to any facts or  
19 characterizations contained in Defendant's Interrogatories.

20           19.     Finjan objects to each and every Interrogatory, Definition, and Instruction to the extent that  
21 they purport to impose any requirement or discovery obligation greater than or different from those  
22 imposed by the Federal Rules of Civil Procedure, the Local Rules of this Court, or orders of the Court  
23 governing these proceedings.

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