

1 EDWARD G. POPLAWSKI (SBN 113590)
epoplawski@wsgr.com
2 OLIVIA M. KIM (SBN 228382)
okim@wsgr.com
3 TALIN GORDNIA (SBN 274213)
tgordnia@wsgr.com
4 WILSON SONSINI GOODRICH &
5 ROSATI
Professional Corporation
6 633 West Fifth Street, Suite 1550
Los Angeles, CA 90071
7 Telephone: (323) 210-2900
8 Facsimile: (866) 974-7329

RYAN R. SMITH (SBN 229323)
rsmith@wsgr.com
CHRISTOPHER D. MAYS (SBN 266510)
cmays@wsgr.com
WILSON SONSINI GOODRICH &
ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 493-6811

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.)
20)
21)
22)

CASE NO.: 4:18-cv-07229-YGR (TSH)
DECLARATION OF
CHRISTOPHER D. MAYS IN
SUPPORT OF DEFENDANT
QUALYS INC.'S MOTION TO
STRIKE

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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 Portions of Plaintiff Finjan LLC’s Infringement and Damages Expert
6 Reports.
7

8 2. Attached as **Exhibit 1** is a true and correct copy of selected portions of the Expert
9 Report of Nenad Medvidovic, Ph.D., served December 2, 2020.

10 3. Attached as **Exhibit 2** is a true and correct copy of selected portions of the Opening
11 Expert Report of Eric Cole, Ph.D., served December 1, 2020.

12 4. Attached as **Exhibit 3** is a true and correct copy of selected portions of the Expert
13 Report of DeForest McDuff, Ph.D., served December 1, 2020.

14 5. Attached as **Exhibit 4** is a true and correct copy of U.S. Patent No. 8,225,408.

15 6. Attached as **Exhibit 5** is a true and correct copy of Finjan’s Infringement Contentions
16 Claim Chart for U.S. Patent No. 8,225,408.

17 7. Attached as **Exhibit 6** is a true and correct copy of a letter I wrote to Lisa Kobialka,
18 Finjan’s counsel of record at the time, dated July 23, 2020.

19 8. Attached as **Exhibit 7** is a true and correct copy of a letter I received from Kris
20 Kastens, Finjan’s counsel of record at the time, dated August 13, 2020.

21 9. Attached as **Exhibit 8** is a true and correct copy of selected portions of Finjan’s
22 Damages Contentions, served October 30, 2019.

23 10. Attached as **Exhibit 9** is a true and correct copy of selected portions of the Deposition
24 Transcript of Holger Kruse, taken on September 14, 2020.

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11. Attached as **Exhibit 10** is a true and correct copy of an index prepared for the Court’s convenience detailing the identifying: (1) the paragraph(s) of Medvidovic’s expert report to be struck; (2) the claim element the paragraph(s) pertains to; (3) pincites to the relevant portion of the Infringement Contentions; and (4) a brief statement regarding the basis for striking the paragraph(s).

12. Attached as **Exhibit 11** is a true and correct copy of FINJAN-QUALYS 042650.

13. Attached as **Exhibit 12** is a true and correct copy of selected portions of the Rebuttal Expert Report of Dr. Avi. Rubin Regarding U.S. Patent No. 8,225,408, served January 12, 2021

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct and that this Declaration is executed this 22 day of January, 2021, in Morgan Hill, California.

By: /s/ Christopher D. Mays
Christopher D. Mays