

Exhibit 19

REDACTED VERSION OF DOCUMENT
SOUGHT TO BE SEALED

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 -----x

5 FINJAN, INC., a Delaware :
6 Corporation, :

7 Plaintiff, : Case No.:

8 vs. : 4:18-CV-07229-YGR

9 QUALYS, INC., a Delaware :
10 Corporation, :

11 Defendant. :

12 -----x

13
14 HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

15
16 Videotaped Deposition of QUALYS, INC.,
17 by and through its corporate designee,

18 HOLGER KRUSE

19 Conducted Virtually

20 Monday, September 14, 2020

21 9:00 a.m. PDT

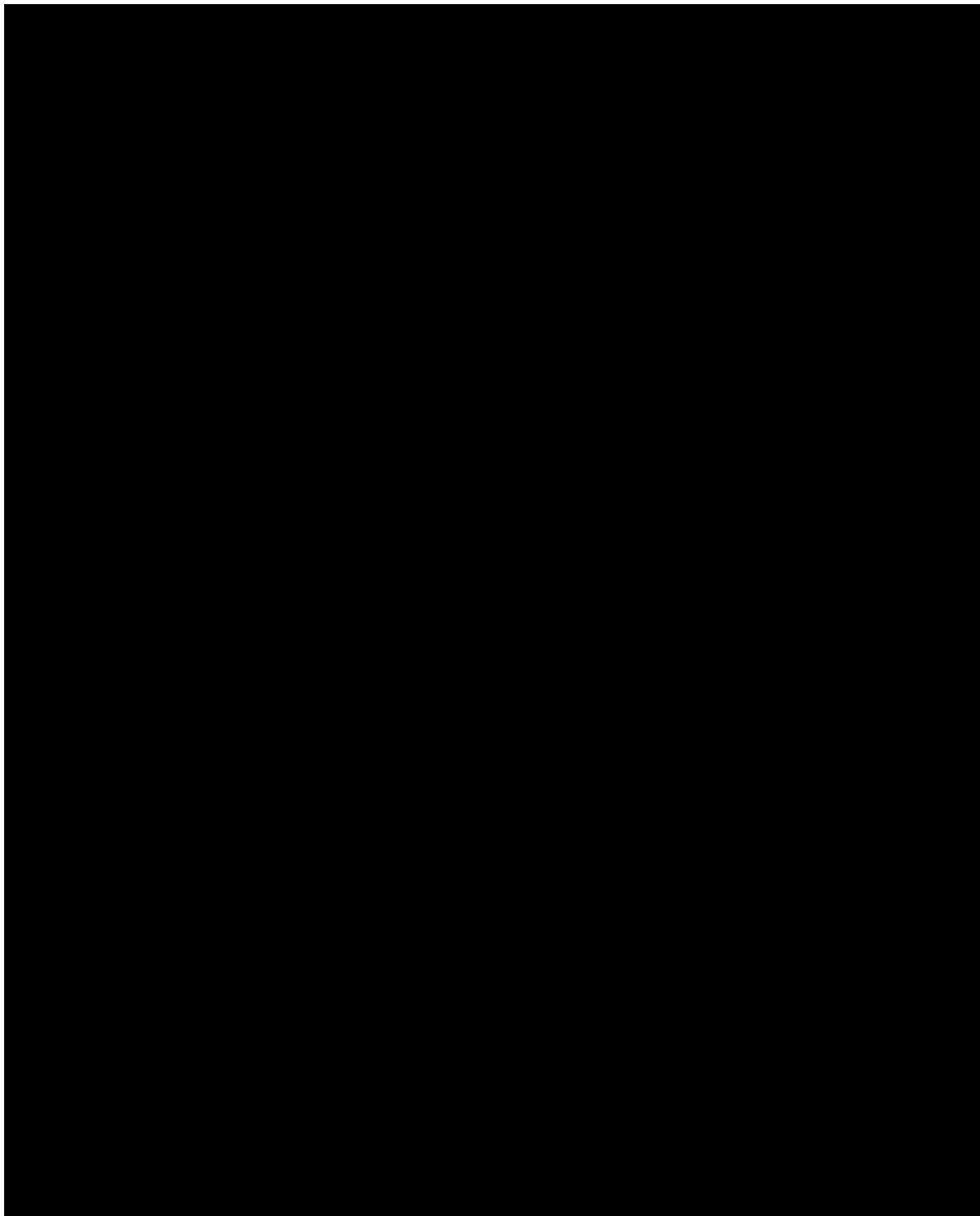
22
23 Job No.: 320088

24 Pages: 1 - 197

25 Reported By: Theresa A. White, CSR, RPR, RMR, CRR

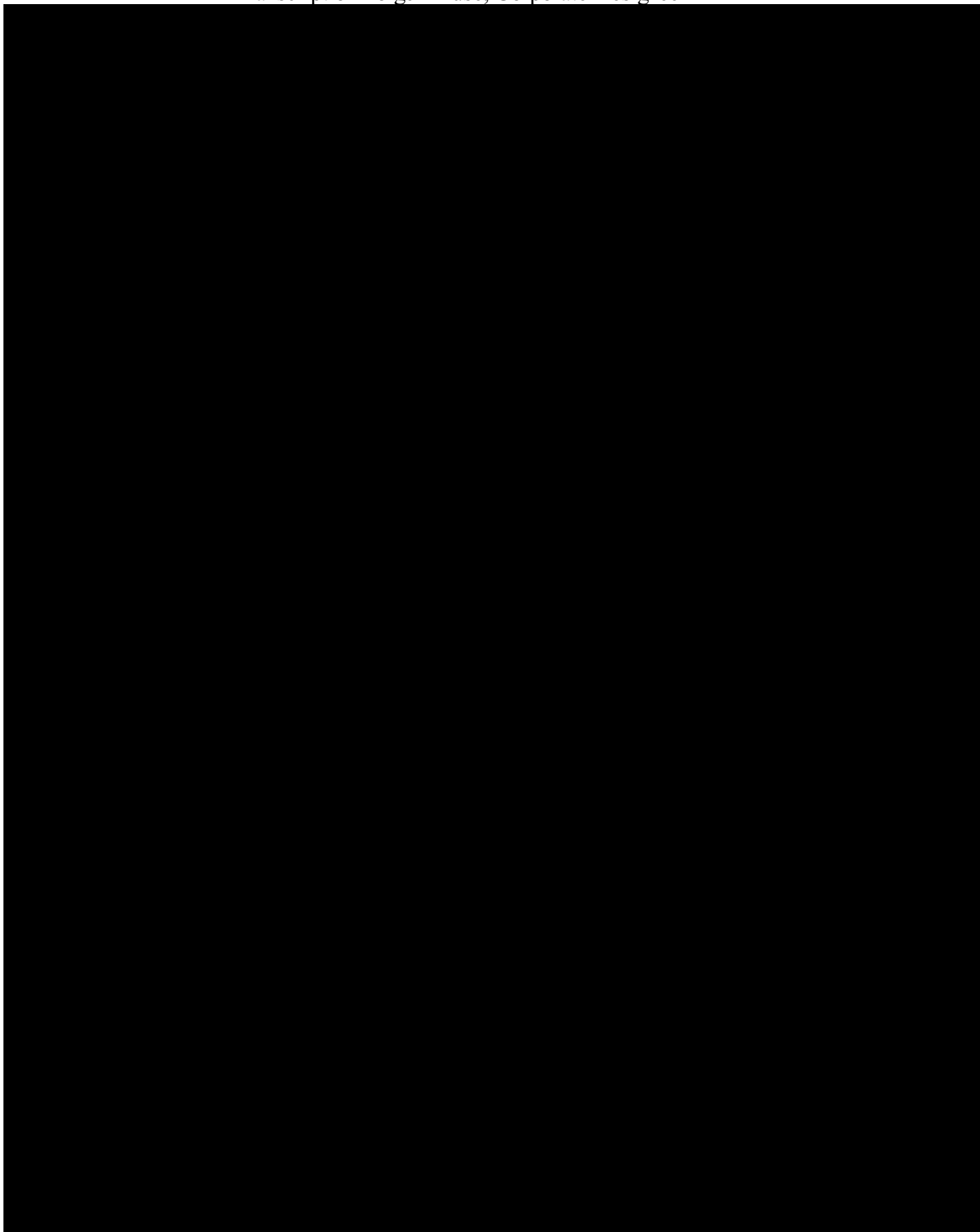
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Transcript of Holger Kruse, Corporate Designee



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Transcript of Holger Kruse, Corporate Designee



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Transcript of Holger Kruse, Corporate Designee

Conducted on September 14, 2020

9

1	management, policy compliance and web application	09:04:38
2	scanning?	09:04:41
3	MR. MAYS: Same objection.	09:04:41
4	THE WITNESS: There may be indirect use of	09:04:42
5	the results. The scan types which we receive are	09:04:46
6	always one of these three types, but there may be	09:04:49
7	products in the front end which make use of this	09:04:53
8	data for other purposes. I'm not aware of any	09:04:57
9	details of how this data might be used.	09:05:00
10	Q (By Mr. Lee) Can you elaborate? What do	09:05:03
11	you mean by "indirect use of the results"?	09:05:05
12	A Well, the results of scans are stored in	09:05:08
13	the data center, and we have multiple different	09:05:13
14	products which make use of scan results in	09:05:15
15	different ways. Vulnerability management and	09:05:18
16	policy compliance are the core products, but other	09:05:23
17	products have been layered around it which may	09:05:26
18	also make use of those results in different ways.	09:05:29
19	Q Which products make indirect use of the	09:05:31
20	results?	09:05:33
21	A I don't have any details. I just know	09:05:33
22	that the data has been imported into other	09:05:35
23	products in the past.	09:05:38
24	MR. MAYS: And objection. Outside the	09:05:39
25	scope.	09:05:41

PLANET DEPOS

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