

# EXHIBIT 2

**Gordnia, Talin**

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**From:** Jason Wolff <wolff@fr.com>  
**Sent:** Tuesday, June 1, 2021 10:46 AM  
**To:** Smith, Ryan; Mays, Christopher; WSGR - Qualys/Finjan  
**Cc:** Aamir Kazi; Phillip Goter; Lawrence Jarvis; Nicole Williams; Elizabeth M. Wilton  
**Subject:** Finjan v. Qualys: motion for leave for additional pages

[External]

Counsel,

As a precaution, Finjan will seek leave to file a 25 page reply for its SJ motion and opposition to Qualys’s motion for summary judgment. Finjan will file one brief addressing all issues that is 25 pages or less.

Will Qualys stipulate to the additional pages, or will it oppose Finjan’s motion?

The reason we raise this is Qualys titled its SJ motion a cross-motion. It is not a cross-motion, since it is not on the same issue Finjan filed on. Had it been filed as a SJ motion, Finjan would have 25 pages per Judge Gonzalez Roger’s Standing Order, as each side gets 25 pages of briefing for their summary judgment motion and opposition. Standing Order at 9.b; Local Rule 7-3. By Qualys calling its motion a cross-motion, it is unclear whether Finjan is limited to 15 pages (per the Standing Order on “cross-motions”) or 25 pages, per Local Rule 7-3.

Please let us know you are available for a meet and confer today if Qualys cannot stipulate to Finjan’s request.

Thanks,  
Jason

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