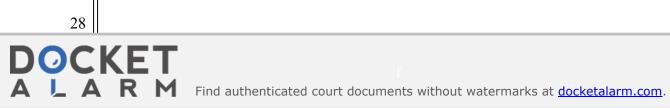
1 2 3 4 5 6 7 8 9 10 11 12	DUANE MORRIS LLP D. Stuart Bartow (SBN 233107) DSBartow@duanemorris.com Nicole E. Grigg (SBN 307733) 2475 Hanover Street Palo Alto, CA 94304-1194 Telephone: 650.847.4150 Facsimile: 650.847.4151 DUANE MORRIS LLP Joseph A. Powers (PA SBN 84590) Admitted Pro Hac Vice japowers@duanemorris.com Jarrad M. Gunther (PA SBN 207038) Admitted Pro Hac Vice jmgunther@duanemorris.com 30 South 17th Street Philadelphia, PA 19103 Telephone: 215.979.1000 Facsimile: 215.979.1020 Attorneys for Defendant SONICWALL INC.	DUANE MORRIS LLP Matthew C. Gaudet (GA SBN 287759) Admitted Pro Hac Vice mcgaudet@duanemorris.com Robin L. McGrath (GA SBN 493115) Admitted Pro Hac Vice rlmcgrath@duanemorris.com David C. Dotson (GA SBN 138040) Admitted Pro Hac Vice dcdotson@duanemorris.com Jennifer H. Forte (GA SBN 940650) Admitted Pro Hac Vice jhforte@duanemorris.com 1075 Peachtree Street, Ste. 2000 Atlanta, GA 30309 Telephone: 404.253.6900 Facsimile: 404.253.6901
13	UNITED STATES DISTRICT COURT	
14	NORTHERN DISTRICT OF CALIFORNIA	
15	SAN JOSE DIVISION	
16	FINJAN, INC., a Delaware Corporation,	Case No.: 5:17-cv-04467-BLF-VKD
17	Plaintiff,	DECLARATION OF MATTHEW GAUDET PURSUANT TO INTERIM
18	VS.	ORDER RE APRIL 17, 2020 JOINT DISCOVERY LETTER BRIEF
19	SONICWALL INC., a Delaware Corporation	DISCOVERT EDITER BRIEF
20	Defendant.	
21		
22		
23		
24		
25		
26		
27		



I, Matthew Gaudet, declare as follows:

- 1. I am a partner at the law firm of Duane Morris LLP and am counsel for Defendant SonicWall Inc. ("SonicWall"). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness, could and would testify competently to such facts under oath. I submit this Declaration pursuant to the Court's Interim Order Re April 17, 2020 Joint Discovery Letter Brief [ECF 255]. In making this Declaration, it is not my intention, nor the intention of SonicWall, to waive the attorney-client privilege, the attorney work-product immunity, or any other applicable privilege.
- 2. Attached hereto as **Exhibit 1** is a true and correct copy of Cisco Systems, Inc. Mutual Non-Disclosure Agreement dated January 19, 2004 and terminating five years following receipt of the Confidential Information (Section 11.0).
- 3. Attached hereto as **Exhibit 2** is a true and correct copy of Finjan Software Inc. Amended and Restated Investors' Rights Agreement dated June 2, 2004 with the Board Observer provision appearing on page 15 (Section 2.7).
- 4. Attached hereto as **Exhibit 3** is a true and correct copy of the Cisco Finjan Holdings, Inc. Mutual Non-Disclosure Agreement dated March 21, 2014 that I referenced during Mr. Samet's deposition at 194:4-13.
- 5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the February 1, 2019 deposition of Yoav Samet.
- 6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the April 10, 2019 deposition of Daniel Chinn.
- 7. Attached hereto as **Exhibit 6** is a true and correct copy of Exhibit 34 to the April 10, 2019 deposition of Daniel Chinn.
- 8. Attached hereto as **Exhibit 7** is a true and copy of excerpts from the Trial Exhibit Lists filed by Finjan, Inc. and Cisco Systems, Inc. identifying the unredacted versions of the Disputed Documents as trial exhibits in the matter or *Finjan, Inc. v. Cisco Systems, Inc.*, No. 5:17-cv-00072-BLF (N.D. Cal.).



Case 5:17-cv-04467-BLF Document 259 Filed 05/04/20 Page 3 of 3

I declare under penalty of perjury under the laws of California and the United States that the foregoing is true and correct.

Executed on May 4, 2020, in Atlanta, Georgia.

/s/ Matthew C. Gaudet
Matthew C. Gaudet

