

# **EXHIBIT O**

**REDACTED**

**From:** Hannah, James <JHannah@KRAMERLEVIN.com>

**Sent:** Thursday, July 23, 2020 5:19 PM

**To:** Dotson, David C. <DCDotson@duanemorris.com>; McGrath, Robin <RLMcGrath@duanemorris.com>; Gunther, Jarrad M. <JMGunther@duanemorris.com>

**Cc:** Lee, Hannah <HLee@KRAMERLEVIN.com>

**Subject:** RE: Revised Appendices H-2 Through H-4

David, attached are the revised appendices for H-6 and H-7.

James Hannah

Partner

Kramer Levin Naftalis & Frankel LLP

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**From:** Dotson, David C. <[DCDotson@duanemorris.com](mailto:DCDotson@duanemorris.com)>

**Sent:** Thursday, July 23, 2020 12:12 PM

**To:** Hannah, James <[JHannah@KRAMERLEVIN.com](mailto:JHannah@KRAMERLEVIN.com)>; McGrath, Robin <[RLMcGrath@duanemorris.com](mailto:RLMcGrath@duanemorris.com)>; Gunther, Jarrad M. <[JMGunther@duanemorris.com](mailto:JMGunther@duanemorris.com)>

**Cc:** Lee, Hannah <[HLee@KRAMERLEVIN.com](mailto:HLee@KRAMERLEVIN.com)>

**Subject:** [EXTERNAL] RE: Revised Appendices H-2 Through H-4

James,

Given the stage of this case, your failure to respond will leave us with no choice but to move to strike Finjan's contentions on the issues identified below.

Please provide a response by tomorrow, or we will plan to move forward with a motion.

Thanks,  
David

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**From:** Dotson, David C.  
**Sent:** Monday, July 20, 2020 8:38 AM  
**To:** 'Hannah, James' <[JHannah@KRAMERLEVIN.com](mailto:JHannah@KRAMERLEVIN.com)>; McGrath, Robin <[RLMcGrath@duanemorris.com](mailto:RLMcGrath@duanemorris.com)>; Gunther, Jarrad M. <[JMGunther@duanemorris.com](mailto:JMGunther@duanemorris.com)>  
**Cc:** 'Lee, Hannah' <[HLee@KRAMERLEVIN.com](mailto:HLee@KRAMERLEVIN.com)>  
**Subject:** RE: Revised Appendices H-2 Through H-4

James,

Following up on the below.

Thanks,  
David

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**From:** Dotson, David C.  
**Sent:** Monday, July 13, 2020 10:08 AM  
**To:** 'Hannah, James' <[JHannah@KRAMERLEVIN.com](mailto:JHannah@KRAMERLEVIN.com)>; McGrath, Robin <[RLMcGrath@duanemorris.com](mailto:RLMcGrath@duanemorris.com)>; Gunther, Jarrad M. <[JMGunther@duanemorris.com](mailto:JMGunther@duanemorris.com)>  
**Cc:** Lee, Hannah <[HLee@KRAMERLEVIN.com](mailto:HLee@KRAMERLEVIN.com)>  
**Subject:** RE: Revised Appendices H-2 Through H-4

James,



Also, on our call, we discussed the potential confusion surrounding SonicWall's April 2 email stating its understanding that Finjan would withdraw Appendix H-3, and we agreed to revisit our respective notes on that issue. Based on our notes, it appears to us that the reference to Finjan withdrawing Appendix H-3 was correct because Appendix H-3 identifies the Stats server as the alleged "security computer," which is in contravention of the Court's November 20 Order. See Revised Appx. H-3 at 7, 9. The Court stated in its November 20 Order with respect to the '154 Patent that "Finjan's reliance on the Stats server and the URL Thumbprint Database constitutes new theories of infringement not previously disclosed and not within the scope of the Court's May 2019 order." November 20, 2019 Order at 9.

So that we are all on the same page, please confirm that Finjan has withdrawn Appx. H-1, H-3, and H-5.

Please also confirm that Finjan will revise Appendices H-6 and H-7 to address the "transmitting . . . when" limitation.

Thanks,

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**From:** Hannah, James <[JHannah@KRAMERLEVIN.com](mailto:JHannah@KRAMERLEVIN.com)>  
**Sent:** Thursday, July 2, 2020 6:29 PM  
**To:** McGrath, Robin <[RLMcGrath@duanemorris.com](mailto:RLMcGrath@duanemorris.com)>; Dotson, David C. <[DCDotson@duanemorris.com](mailto:DCDotson@duanemorris.com)>  
**Cc:** Lee, Hannah <[HLee@KRAMERLEVIN.com](mailto:HLee@KRAMERLEVIN.com)>  
**Subject:** Revised Appendices H-2 Through H-4

Robin, David, please see the attached revised appendices based on our discussion this afternoon. The changes can be found on Pg. 14 of H-2; Pg. 11 of H-3; and Pg. 14 of H-4. Thanks.

James

James Hannah  
Partner

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