

EXHIBIT P

REDACTED

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

Sent: Friday, July 24, 2020 8:20 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 is a further revised version of H-3 which addresses the issues you raised. Thanks.

James

James Hannah

Partner

Kramer Levin Naftalis & Frankel LLP
990 Marsh Road, Menlo Park, California 94025
O 650.752.1712 F 650.752.1812

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From: Dotson, David C. <DCDotson@duanemorris.com>

Sent: Friday, July 24, 2020 12:43 PM

To: Hannah, James <JHannah@KRAMERLEVIN.com>; McGrath, Robin <RLMcGrath@duanemorris.com>; Gunther, Jarrad M. <JMGunther@duanemorris.com>

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

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

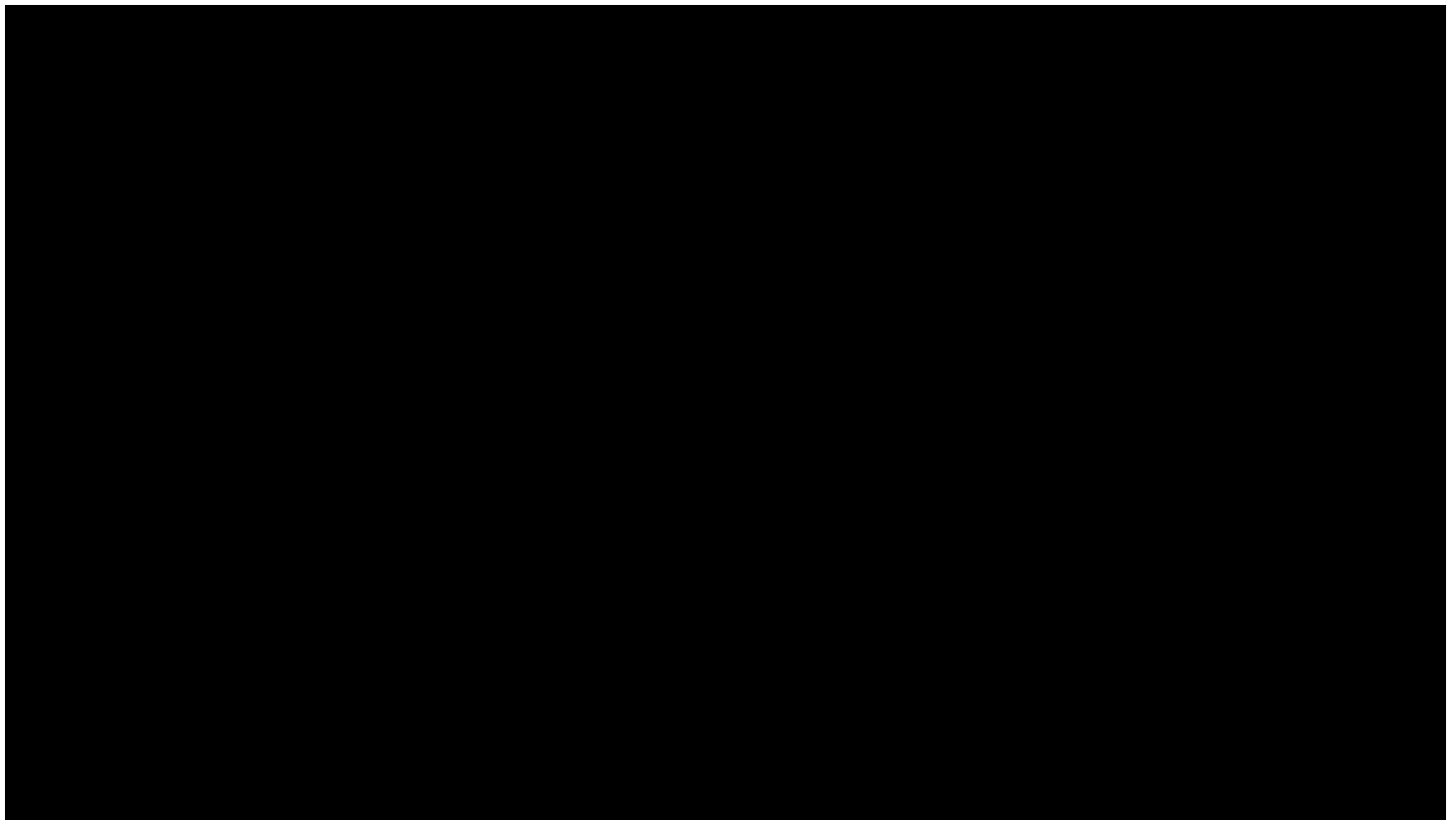
James- I don't think the Appendix H-3 issues should be controversial. Please confirm Finjan is withdrawing Appendix H-3.

The Court's November 20 Order at p. 9 says:

1 Second, with respect to the '154 patent, SonicWall says that in addition to identifying the
2 CloudAV and GRID sandboxes as the “security computer” of claim 1 for the Gateway
3 instrumentalities “alone,” Finjan now also identifies the “Stats server” as the “security computer.”
4 Similarly, in addition to identifying the GRID sandbox as the “security computer” for the ESA
5 instrumentalities “alone,” Finjan now also identifies the “URL Thumbprint Database” as the
6 “security computer.” Dkt. No. 164 at 18–19. Finjan responds that the Stats server is a component

22 whether the URL is malicious”). Accordingly, the Court finds that Finjan’s reliance on the
23 Stats server and the URL Thumbprint Database constitutes new theories of infringement not
24 previously disclosed and not within the scope of the Court’s May 2019 order.

Revised Appendix H-3 nonetheless identifies the stats server (and nothing else) as the “security computer”:



From: Dotson, David C.
Sent: Thursday, July 23, 2020 5:21 PM
To: 'Hannah, James' <JHannah@KRAMERLEVIN.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

Thanks, James. Please confirm Finjan has withdrawn Appendix H-3 (in addition to Appendix H-1 and H-5), given its reliance on the "stats server" as the alleged "security computer" in contravention of the Court's November 20 Order.

David

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

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From: Dotson, David C. <DCDotson@duanemorris.com>

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

To: Hannah, James <JHannah@KRAMERLEVIN.com>; McGrath, Robin <RLMcGrath@duanemorris.com>; Gunther, Jarrad M. <JMGunther@duanemorris.com>

Cc: Lee, Hannah <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

From: Dotson, David C.

Sent: Monday, July 20, 2020 8:38 AM

To: 'Hannah, James' <JHannah@KRAMERLEVIN.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

James,

Following up on the below.

Thanks,
David

From: Dotson, David C.

Sent: Monday, July 13, 2020 10:08 AM

To: 'Hannah, James' <JHannah@KRAMERLEVIN.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

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,
David

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

Sent: Thursday, July 2, 2020 6:29 PM

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