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FINJAN LLC

14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 (SAN JOSE DIVISION)

18 FINJAN LLC, a Delaware Limited Liability  
19 Company,  
20 Plaintiff,  
21 v.  
22 SONICWALL INC., a Delaware Corporation,  
23 Defendant.

Case No. 5:17-cv-04467-BLF (VKD)

**DECLARATION OF JASON W. WOLFF  
IN SUPPORT OF FINJAN LLC'S  
OPPOSITION TO SONICWALL INC.'S  
MOTION TO STRIKE NEW THEORIES  
IN FINJAN LLC'S EXPERT REPORTS**

Date: March 11, 2021  
Time: 9:00 a.m.  
Judge: Hon. Beth Labson Freeman  
Dept: Courtroom 3, Fifth Floor

1 I, Jason W. Wolff, hereby declare and state as follows:

2 1. I am a principal in the law firm of Fish & Richardson P.C., counsel of record for  
3 Plaintiff Finjan LLC in the above-captioned matter. I have personal knowledge of all the facts  
4 contained herein and, if called as a witness, I could and would testify competently thereto.

5 2. Attached as Exhibit A is a true and correct copy of an excerpt from Appendix G-2 to  
6 Finjan's Initial Disclosure of Asserted Claims and Infringement Contentions and Document  
7 Production Pursuant to Patent L.R. 3-1 and 3-2, dated April 10, 2018.

8 3. Attached as Exhibit B (filed under seal) is a true and correct copy of an excerpt from  
9 Appendix G-2 to Finjan's Third Supplemental Disclosure of Asserted Claims and Infringement  
10 Contentions and Document Production Pursuant to Patent L.R. 3-1 and 3-2, dated December 11,  
11 2019.

12 4. Attached as Exhibit C (filed under seal) is a true and correct copy of an excerpt from  
13 the Expert Report of Dr. Nenad Medvidovic Regarding Infringement by SonicWall, Inc. of Patent  
14 Nos. 8,225,408; 7,975,305 and 8,141,154, dated September 3, 2020.

15 5. Attached as Exhibit D (filed under seal) is a true and correct copy of an excerpt from  
16 Appendix G-4 to Finjan's Third Supplemental Disclosure of Asserted Claims and Infringement  
17 Contentions and Document Production Pursuant to Patent L.R. 3-1 and 3-2, dated December 11,  
18 2019.

19 6. Attached as Exhibit E (filed under seal) is a true and correct copy of an excerpt from  
20 Appendix G-3 to Finjan's Third Supplemental Disclosure of Asserted Claims and Infringement  
21 Contentions and Document Production Pursuant to Patent L.R. 3-1 and 3-2, dated December 11,  
22 2019.

23 7. Attached as Exhibit F (filed under seal) is a true and correct copy of an excerpt from  
24 Appendix G-2 to Finjan's First Supplemental Disclosure of Asserted Claims and Infringement  
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1 Contentions and Document Production Pursuant to Patent L.R. 3-1 and 3-2, dated November 9,  
2 2018.

3 8. Attached as Exhibit G (filed under seal) is a true and correct copy of an excerpt from  
4 Appendix E-2 to Finjan's Third Supplemental Disclosure of Asserted Claims and Infringement  
5 Contentions and Document Production Pursuant to Patent L.R. 3-1 and 3-2, dated December 11,  
6 2019.

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8 9. Attached as Exhibit H is a true and correct copy of an excerpt from Appendix D-2 to  
9 Finjan's Initial Disclosure of Asserted Claims and Infringement Contentions and Document  
10 Production Pursuant to Patent L.R. 3-1 and 3-2, dated April 10, 2018.

11 10. Attached as Exhibit I (filed under seal) is a true and correct copy of an excerpt from  
12 Appendix D-2 to Finjan's First Supplemental Disclosure of Asserted Claims and Infringement  
13 Contentions and Document Production Pursuant to Patent L.R. 3-1 and 3-2, dated November 9,  
14 2018.

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16 11. Attached as Exhibit J (filed under seal) is a true and correct copy of an excerpt from  
17 Appendix D-3 to Finjan's Second Supplemental Disclosure of Asserted Claims and Infringement  
18 Contentions and Document Production Pursuant to Patent L.R. 3-1 and 3-2, dated May 31, 2019.

19 12. Attached as Exhibit K (filed under seal) is a true and correct copy of an excerpt from  
20 Appendix D-3 to Finjan's Third Supplemental Disclosure of Asserted Claims and Infringement  
21 Contentions and Document Production Pursuant to Patent L.R. 3-1 and 3-2, dated December 11,  
22 2019.

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24 13. Attached as Exhibit L (filed under seal) is a true and correct copy of an excerpt from  
25 the Expert Report of Michael Mitzenmacher, Ph.D. Regarding Infringement of SonicWall, Inc. of  
26 Patent Nos. 6,804,780; 6,965,968; and 7,613,926, dated September 3, 2020.

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1           14. Attached as Exhibit M (filed under seal) is a true and correct copy of an excerpt from  
2 Appendix H-1 to Finjan’s Third Supplemental Disclosure of Asserted Claims and Infringement  
3 Contentions and Document Production Pursuant to Patent L.R. 3-1 and 3-2, dated December 11,  
4 2019.

5           15. Attached as Exhibit N (filed under seal) is a true and correct copy of an excerpt from  
6 Appendix H-5 to Finjan’s Third Supplemental Disclosure of Asserted Claims and Infringement  
7 Contentions and Document Production Pursuant to Patent L.R. 3-1 and 3-2, dated December 11,  
8 2019.

9           16. Attached as Exhibit O (filed under seal) is a true and correct copy of an excerpt from  
10 the Expert Report of DeForest McDuff, Ph.D., dated September 4, 2020.

11           17. Attached as Exhibit P (filed under seal) is a true and correct copy of an excerpt from  
12 a document entitled, “SonicWall Threat Research Telemetry Database”, which was produced  
13 beginning at SonicWall-Finjan\_00519307.  
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16           I declare under the penalty of perjury of the laws of the United States of America that the  
17 foregoing is true and correct. Executed on November 24, 2020, in San Diego, California.

18  
19                                           */s/ Jason W. Wolff* \_\_\_\_\_

Jason W. Wolff

[wolff@fr.com](mailto:wolff@fr.com)

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21                                           ***Attorneys for Plaintiff***

22                                           **FINJAN LLC**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on November 24, 2020 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system. Any other counsel of record will be served by electronic mail and regular mail.

*/s/ Jason W. Wolff* \_\_\_\_\_  
Jason W. Wolff  
[wolff@fr.com](mailto:wolff@fr.com)

*Attorneys for Plaintiff*  
FINJAN LLC

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