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10 Attorneys for Plaintiff Finjan, Inc.

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 14 IN THE UNITED STATES DISTRICT COURT
 15 SOUTHERN DISTRICT OF CALIFORNIA

16 FINJAN, INC.,
 17 Plaintiffs,
 18 v.
 19 ESET, LLC and ESET SPOL. S.R.O.,
 20 Defendants.
 21

Case No. 17-cv-0183 CAB (BGS)

**DECLARATION OF JASON W.
 WOLFF IN SUPPORT OF FINJAN,
 INC.’S RESPONSE TO
 DEFENDANTS’ MOTION FOR
 ADDITIONAL DISCOVERY AND
 ISSUANCE OF LETTER OF
 REQUEST**

District Judge: Hon. Cathy Ann
 Bencivengo
 Magistrate Judge: Hon. Bernard G.
 Skomal

1 I, Jason W. Wolff, declare as follows:

2 1. I am a member of Fish & Richardson P.C., counsel of record in this
3 action for Plaintiff Finjan, Inc. (“Finjan”). I am a member of the Bar of the State of
4 California and of this Court. I have personal knowledge of the matters stated in this
5 declaration and would testify truthfully to them if called upon to do so.

6 2. I make this declaration in support of Finjan’s Response to Defendants’
7 Motion for Additional Discovery and Issuance of Letter of Request:

8 3. Attached hereto as Exhibit A is a true and correct copy of excerpts from
9 the transcript of the videotaped deposition Mr. Shlomo Touboul taken July 23, 2018
10 in Tel Aviv, Israel.

11 4. Attached hereto as Exhibit B is a true and correct copy of ESET, LLC
12 and ESET SPOL. S.R.O.’s Notice of Subpoena and Subpoenas to Shlomo Touboul
13 dated March 28, 2018.

14 5. Attached hereto as Exhibit C is a true and correct copy of email
15 correspondence from James Hannah (counsel for Finjan, Inc.) and Scott Penner
16 (counsel for ESET, LLC, ESET SPOL. S.R.O.) dated July 5, 2019.

17 I declare under penalty of perjury under the laws of the United States that the
18 forgoing is true and correct.

19 Executed at San Diego, California on November 30, 2020.

20 /s/ Jason W. Wolff
21 Jason W. Wolff

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on November 30, 2020, to all counsel of record who are deemed to have consented to electronic service via the Court’s CM/ECF system per Civil Local Rule 5.4. Any other counsel of record will be served by electronic mail, facsimile and/or overnight delivery.

/s/ Jason W. Wolff

Jason W. Wolff