

EXHIBIT B

From: Michael A. Amon
Sent: Tuesday, November 17, 2020 10:39 AM
To: Penner, Scott
Cc: ESET-Finjan; Elizabeth M. Wilton; Donna L. Rousseau; Roger Denning; Lawrence Jarvis; Jason Wolff
Subject: RE: Finjan v. ESET: Motion to Amend Caption

Scott,

Let's plan to talk at 2:30pm PT tomorrow (Wednesday). We can use the following dial-in: 888-706-0584; 8970102#.

Best,
Mike

Michael Amon :: Principal

Fish & Richardson P.C.
+1-858-678-4708 direct :: 619-865-7095 mobile :: amon@fr.com
fr.com

From: Penner, Scott <scottpenner@eversheds-sutherland.com>
Sent: Tuesday, November 17, 2020 10:28 AM
To: Michael A. Amon <Amon@fr.com>
Cc: ESET-Finjan <eset-finjan@eversheds-sutherland.com>; Elizabeth M. Wilton <wilton@fr.com>; Donna L. Rousseau <Rousseau@fr.com>; Roger Denning <denning@fr.com>; Lawrence Jarvis <jarvis@fr.com>; Jason Wolff <wolff@fr.com>
Subject: RE: Finjan v. ESET: Motion to Amend Caption

Dear Mike,

As mentioned below, ESET would not opposed the motion to amend the caption on the assumption that Finjan will be producing the documents related to the Fortress acquisition. If, however, Finjan intends to refuse to produce those documents, then ESET will oppose the motion to amend the caption. I am available 9-10:30 Wednesday or after 2:00pm Wednesday.

Best Regards,

--Scott

Scott Penner | Partner | T: +1.858.252.2510

Visit our COVID-19 [legal hub](#)!

From: Michael A. Amon <Amon@fr.com>
Sent: Monday, November 16, 2020 10:10 PM
To: Penner, Scott <ScottPenner@eversheds-sutherland.us>

Cc: ESET-Finjan <ESET-Finjan@eversheds-sutherland.us>; Elizabeth M. Wilton <wilton@fr.com>; Donna L. Rousseau <Rousseau@fr.com>; Roger Denning <denning@fr.com>; Lawrence Jarvis <jarvis@fr.com>; Jason Wolff <wolff@fr.com>
Subject: RE: Finjan v. ESET: Motion to Amend Caption

Dear Scott,

Finjan provided documentation showing that Finjan, Inc. was converted to a Delaware Limited Liability Company, which should be sufficient for ESET to determine whether it will consent or not to Finjan's motion to amend the caption. If, based on the documentation we produced, ESET is not willing to consent, then please let me know when you are available tomorrow or Wednesday to meet and confer so that we can proceed to file an opposed motion to amend the caption.

Best,
Mike

Michael Amon :: Principal

Fish & Richardson P.C.
+1-858-678-4708 direct :: 619-865-7095 mobile :: amon@fr.com
fr.com

From: Penner, Scott <scottpenner@eversheds-sutherland.com>
Sent: Monday, November 16, 2020 5:41 PM
To: Michael A. Amon <Amon@fr.com>
Cc: ESET-Finjan <eset-finjan@eversheds-sutherland.com>; Elizabeth M. Wilton <wilton@fr.com>; Donna L. Rousseau <Rousseau@fr.com>; Roger Denning <denning@fr.com>; Lawrence Jarvis <jarvis@fr.com>; Jason Wolff <wolff@fr.com>
Subject: RE: Finjan v. ESET: Motion to Amend Caption

Dear Mike,

On the assumption that Finjan will be substantively producing documents responsive to ESET's 7th Set of RFPs regarding the topics related to the Fortress acquisition of Finjan, Inc., ESET will not oppose the motion to change the caption. If Finjan intends to refuse to produce the documents relevant to the Fortress acquisition then ESET suggests filing the motion as an opposed motion.

Best Regards,

--Scott

Scott Penner | Partner | T: +1.858.252.2510

Visit our COVID-19 [legal hub](#)!

From: Michael A. Amon <Amon@fr.com>
Sent: Monday, November 16, 2020 2:26 PM
To: Penner, Scott <ScottPenner@eversheds-sutherland.us>
Cc: ESET-Finjan <ESET-Finjan@eversheds-sutherland.us>; Elizabeth M. Wilton <wilton@fr.com>; Donna L. Rousseau

<Rousseau@fr.com>; Roger Denning <denning@fr.com>; Lawrence Jarvis <jarvis@fr.com>; Jason Wolff <wolff@fr.com>
Subject: RE: Finjan v. ESET: Motion to Amend Caption

Scott,

Attached please find the document showing Plaintiff's change from a Delaware corporation to a Delaware limited liability company. This document was produced to you today. Can you please let us know if ESET will oppose our motion to change the caption to reflect this change?

Best,
Mike

Michael Amon :: Principal

Fish & Richardson P.C.
+1-858-678-4708 direct :: 619-865-7095 mobile :: amon@fr.com
fr.com

From: Penner, Scott <scottpenner@eversheds-sutherland.com>
Sent: Thursday, November 12, 2020 4:22 PM
To: Michael A. Amon <Amon@fr.com>
Cc: ESET-Finjan <eset-finjan@eversheds-sutherland.com>; Elizabeth M. Wilton <wilton@fr.com>; Donna L. Rousseau <Rousseau@fr.com>; Roger Denning <denning@fr.com>; Lawrence Jarvis <jarvis@fr.com>; Jason Wolff <wolff@fr.com>
Subject: RE: Finjan v. ESET: Motion to Amend Caption

[This email originated outside of F&R.]

Dear Mike,

ESET does not believe that it will object to amending the caption but Finjan has not produced any of the documents that would support the entity change. We had assumed that such documents would have been produced as part of Finjan's production this week. After completing our review of the documents Finjan produced, however, we did not see any of the documents relating to the acquisition. Once ESET has been able to verify the corporate change through Finjan's document production we anticipate ESET will not oppose amending the caption.

Best Regards,

--Scott

Scott Penner | Partner | T: +1.858.252.2510

Visit our COVID-19 [legal hub](#)!

From: Michael A. Amon <Amon@fr.com>
Sent: Wednesday, November 11, 2020 4:45 PM
To: Penner, Scott <ScottPenner@eversheds-sutherland.us>

Cc: ESET-Finjan <ESET-Finjan@eversheds-sutherland.us>; Elizabeth M. Wilton <wilton@fr.com>; Donna L. Rousseau <Rousseau@fr.com>; Roger Denning <denning@fr.com>; Lawrence Jarvis <jarvis@fr.com>; Jason Wolff <wolff@fr.com>
Subject: Finjan v. ESET: Motion to Amend Caption

Dear Scott,

Plaintiff Finjan plans to file a motion to amend the caption of the case to reflect that Plaintiff Finjan changed from a Delaware corporation to a Delaware limited liability company. Can you please let us know if Eset will oppose that motion?

Best,
Mike

Michael Amon :: Principal

Fish & Richardson P.C.
+1-858-678-4708 direct :: 619-865-7095 mobile :: amon@fr.com
fr.com

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized use or disclosure is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

Eversheds Sutherland (US) LLP is part of a global legal practice, operating through various separate and distinct legal entities, under Eversheds Sutherland. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.

This e-mail message, together with any attachments, is intended only for the above named recipient(s) and may contain privileged and/or confidential information. If you are not an intended recipient, you must not review, copy or show the message and any attachments to anyone. Please reply to this e-mail and highlight the mistaken transmission to the sender, and then immediately delete the message.

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized use or disclosure is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized use or disclosure is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

