

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

FINJAN, INC., a Delaware Corporation,

Plaintiff,

v.

RAPID7, INC., a Delaware Corporation
and RAPID7 LLC, a Delaware Limited
Liability Company,

Defendants.

C.A. No. 1:18-cv-01519-MN

Jury Trial Demanded

MOTION TO COMPEL PRODUCTION OF IBM DOCUMENTS

Pursuant to Special Master Order #1 (D.I. 169 at ¶ 3) and the Order Appointing Special Master (D.I. 167 at ¶ 3a), Defendants Rapid7, Inc. and Rapid7 LLC (collectively, “Rapid7”) hereby move the Court to Compel Plaintiff Finjan, Inc. (“Finjan”) to produce emails and related documents that hit on Rapid7’s ESI search terms regarding the relationship and patent acquisition and development agreement between Finjan’s wholly owned subsidiary, Finjan Blue, Inc., and IBM (the “IBM Documents”). Alternatively, Rapid7 requests that Finjan stipulate not to refer to its relationship with IBM at trial.

This motion relates to Rapid7’s previously-filed Letter Brief on this issue. D.I. 160.

[SIGNATURE PAGE FOLLOWS.]

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