

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

FINJAN LLC, a Delaware Limited Liability  
Company,

Plaintiff,

v.

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

Defendants.

C.A. No. 18-1519-MN

**FINJAN LLC'S MOTION TO PRECLUDE TRIAL TESTIMONY OF RAPID7'S  
DAMAGES EXPERT STEPHEN BECKER**

Plaintiff Finjan LLC respectfully moves, pursuant to Federal Rules of Evidence 702 and *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993), to preclude the Trial Testimony of Rapid7's damages expert, Dr. Stephen Becker. The grounds for this Motion are set forth in the Opening Brief in support thereof, filed contemporaneously herewith.

Dated: October 23, 2020

FISH & RICHARDSON P.C.

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**ATTORNEYS FOR  
PLAINTIFF FINJAN LLC**

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1.1**

I hereby certify, pursuant to D. Del. LR 7.1.1, that reasonable efforts have been made to reach agreement with opposing counsel on the matters set forth in the foregoing Motion, and that no agreement could be reached.

/s/ Susan E. Morrison

Susan E. Morrison (#4690)