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

FINJAN LLC, a Delaware Limited Liability Company,

Plaintiff,

v.

C.A. No. 18-1519-MN

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

**REDACTED** 

Defendants.

## DECLARATION O F SUSAN E. MORRISON IN SUPPORT OF FINJAN LLC'S REPLY BRIEFS SUPPORTING ITS MOTIONS TO PRECLUDE TRIAL TESTIMONY

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Dated: November 13, 2020 ATTORNEYS FOR PLAINTIFF FINJAN LLC



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I, Susan E. Morrison, under penalty of perjury, declare as follows:

1. I am a partner with the law firm of Fish & Richardson P.C., counsel for Finjan

LLC ("Finjan") in this action. I make this declaration in support of Finjan LLC's Partial

Daubert Motion to Preclude Trial Testimony by Rapid7's Experts Kevin Almeroth, Ph.D.,

Patrick McDaniel, Ph.D., and Somesh Jha, Ph.D., Concerning Sufficiency of Written

Description for the Patents-In-Suit and Finjan LLC's Motion to Preclude Trial Testimony of

Rapid7's Damages Expert Stephen L. Becker. Unless otherwise stated, the matters contained in

this declaration are of my own personal knowledge and, if called as a witness, I could and

would testify competently to the matters set forth herein.

2. Attached hereto as Exhibit L is a true and correct copy of the Reply Expert Report

of Russell L. Parr, CFA, CLP dated August 31, 2020.

I declare under penalty of perjury under the laws of the United States that the foregoing is

true and correct.

Executed this 13<sup>th</sup> day of November, 2020 at Wilmington, DE.

/s/ Susan E. Morrison

Susan E. Morrison



## **CERTIFICATE OF SERVICE**

I hereby certify that on November 13, 2020, I electronically filed with the Clerk of the Court, UNDER SEAL, the foregoing document using CM/ECF, and sent electronic copies of such filing to the following counsel:

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/s/ Susan E. Morrison
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