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INTERROGATORY RESPONSES

Subject to and without waiving its general objections and objections to Definitions set forth above, each of which is specifically incorporated into the specific Responses contained below, Finjan hereby responds to Symantec's Interrogatories as follows:

INTERROGATORY NO. 1:

State the date and location of the first conception and reduction to practice, whether actual or constructive, of each asserted claim of the Asserted Patents and identify all factual and legal support therefor, including all evidence relating to diligence between the date of conception and reduction to practice and description of each person's role and participation in the conception and reduction to practice; all persons having knowledge of such conception, diligence, and reduction to practice; all documents supporting your response (identified by the Bates numbers and including sufficient detail to verify the date, source, and all recipients of the information); and if this information was communicated in an oral or other unrecorded form, provide a complete statement of the communication, the date and time of the communication, and identify all witnesses of this communication.

RESPONSE TO INTERROGATORY NO. 1:

Finjan objects to this Interrogatory as overbroad, unduly burdensome, and oppressive to the extent it seeks information not relevant to any claim or defense of any party and/or not reasonably calculated to lead to the discovery of admissible evidence. Finjan objects to this Interrogatory to the extent it is compound because it is comprised of multiple discrete subparts. Finjan also objects to this Interrogatory as vague and ambiguous, including the terms "location," "information," and "other unrecorded form." Finjan objects to this Interrogatory to the extent it calls for a legal conclusion.

1 Finjan objects to this Interrogatory to the extent it seeks information protected by the attorney-client
2 privilege, the work product doctrine, or any other applicable law, privilege, doctrine, or immunity.

3 Subject to and without waiving the foregoing general and specific objections, Finjan responds
4 as follows:

5 The date of conception for the asserted claims of U.S. Patent No. 6,154,844 (“the ‘844 Patent”)
6 is November 8, 1996 when Provisional Application No. 60/030,639 was filed. The date of reduction to
7 practice for the asserted claims of the ‘844 Patent is November 8, 1996. Shlomo Touboul and
8 Nachshon Gal were involved with, and may have knowledge related to, the conception and reduction
9 to practice of the ‘844 Patent.
10

11 The date of conception for the asserted claims of U.S. Patent No. 7,613,926 (“the ‘926 Patent”)
12 is November 8, 1996. The date of reduction to practice of the asserted claims of the ‘926 Patent is
13 November 6, 1997. Yigal Edery, Nimrod Vered, David Kroll, and Shlomo Touboul were involved
14 with, and may have knowledge related to the conception, diligence, and reduction to practice of the
15 ‘926 Patent. Mr. Edery, Mr. Vered, Mr. Kroll, and Mr. Touboul were reasonably diligent in reducing
16 the inventions of the asserted claims to practice between the date of conception and reduction to
17 practice. The prosecuting attorney was reasonably diligent from the time of conception in working to
18 prepare U.S. Patent Application No. 08/964,388.
19

20 The date of conception for the asserted claims of U.S. Patent No. 7,757,289 (“the ‘289 Patent”)
21 is December 12, 2005. The date of reduction to practice of the asserted claims of the ‘289 Patent is
22 December 12, 2005. David Gruzman and Yuval Ben-Itzhak were involved with, and may have
23 knowledge related to the conception and reduction to practice of the ‘289 Patent.
24

25 The date of conception for the asserted claims of U.S. Patent No. 8,141,154 (“the ‘154 Patent”)
26 is December 12, 2005. The date of reduction to practice of the asserted claims of the ‘154 Patent is
27
28

1 December 12, 2005. David Gruzman and Yuval Ben-Itzhak were involved with, and may have
2 knowledge related to the conception and reduction to practice of the '154 Patent.

3 The date of conception for the asserted claims of U.S. Patent No. 8,667,494 ("the '494 Patent")
4 is November 8, 1996. The date of reduction to practice of the asserted claims of the '494 Patent is
5 November 8, 1996. Yigal Edery, Nimrod Vered, David Kroll, and Shlomo Touboul were involved
6 with, and may have knowledge related to the conception and reduction to practice of the '494 Patent.

7 The date of conception for the asserted claims of U.S. Patent No. 7,930,299 ("the '299 Patent")
8 is no later than November 30, 2005. The date of reduction to practice of the asserted claims of the
9 '299 Patent is no later than November 30, 2005. Yuval Ben-Itzhak and Limor Elbaz were involved
10 with, and may have knowledge related to the conception and reduction to practice of the '299 Patent.

11 The date of conception for the asserted claims of U.S. Patent No. 7,756,996 ("the '996 Patent")
12 is no later than January 30, 2004. The date of reduction to practice of the asserted claims of the '996
13 Patent is no later than January 30, 2004. Shlomo Touboul was involved with, and may have
14 knowledge related to the conception and reduction to practice of the asserted claims of the '996 Patent.

15 The date of conception for the asserted claims of U.S. Patent No. 8,015,182 ("the 182 Patent")
16 is no later than November 30, 2005. The date of reduction to practice of the asserted claims of the
17 '182 Patent is no later than November 30, 2005. Yuval Ben-Itzhak and Limor Elbaz were involved
18 with, and may have knowledge related to the conception and reduction to practice of the asserted
19 claims of the '182 Patent.

20 Documents supporting this response include: FINJAN-SYM 000001-3051. Finjan's
21 investigation of this matter is ongoing and it will comply with Fed. R. Civ. P. 26(e) should additional
22 information become known to it.
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1 by the Court. Finjan objects to this Interrogatory to the extent it its premature and discovery is
2 ongoing. Finjan objects to this Interrogatory to the extent it seeks information within Symantec's
3 possession, custody, or control.

4 Finjan incorporates by reference its response to Interrogatory No. 6. Pursuant to Rule 33(d) of
5 the Federal Rules of Civil Procedure, additional information responsive to this interrogatory may be
6 derived or ascertained from Finjan's forthcoming document production in this matter. Finjan's
7 investigation of this matter is ongoing and it will comply with Fed. R. Civ. P. 26(e) should additional
8 information become known to it.
9

10 Respectfully submitted,
11

12 DATED: December 4, 2014

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PROOF OF SERVICE

I, Amy Qu, am employed in the Menlo Park, California office of Kramer Levin Naftalis & Frankel LLP. I am over the age of 18 and not a party to the within action. My business address is 990 Marsh Road, Menlo Park, California 94025. I am readily familiar with the firm's practice of collecting and processing of mail for mailing with the U.S. Postal Service and overnight delivery services.

On December 4, 2014, I caused the following document(s) to be served:

**PLAINTIFF FINJAN, INC.'S OBJECTIONS AND RESPONSES TO
DEFENDANT SYMANTEC CORP.'S FIRST SET OF
INTERROGATORIES (NOS. 1-11)**

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