

EXHIBIT E

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Attorneys for Plaintiff
11 FINJAN, INC.

12 **IN THE UNITED STATES DISTRICT COURT**
13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 FINJAN, INC., a Delaware Corporation,

16 Plaintiff,

17 v.

18 JUNIPER NETWORKS, INC., a Delaware
19 Corporation,

20 Defendant.

Case No.: 3:17-cv-05659-WHA

**PLAINTIFF FINJAN, INC.’S INITIAL
DISCLOSURE OF ASSERTED CLAIMS
AND INFRINGEMENT CONTENTIONS
AND DOCUMENT PRODUCTION
REGARDING U.S. PATENT NO. 7,418,731
PURSUANT TO PATENT LOCAL RULES
3-1 AND 3-2**

1 Pursuant to Patent Local Rules 3-1 and 3-2 of the United States District Court for the Northern
2 District of California, Plaintiff Finjan, Inc. (“Finjan”) makes the following Initial Disclosure of
3 Asserted Claims and Infringement Contentions and Document Production Accompanying Disclosure
4 Regarding U.S. Patent No. 7,418,731 (the “731 Patent”), including the attached claim charts (the
5 “Disclosure”) to Juniper Networks, Inc. (hereinafter “Juniper” or “Defendant”).

6 Finjan makes this Disclosure based upon information presently known and reasonably available
7 to it as of this date, as Finjan’s investigations are ongoing and Defendant has yet to provide any
8 discovery. Accordingly, Finjan reserves the right to amend, modify, supplement, or narrow any
9 portion of this Disclosure, including, but not limited to, the identification of the claims infringed by
10 Defendant, the products and/or services accused of infringement and the bases and manner of
11 infringement described in this Disclosure. Finjan reserves the right to supplement this Disclosure as
12 necessary and as appropriate in accordance with the Federal Rules of Civil Procedure and this Court’s
13 Local Rules, including Patent Local Rule 3-6, in light of future document production, interrogatory
14 responses, admissions, disclosures, contentions, fact witness testimony, expert discovery, any other
15 discovery, future rulings from the Court (including claim construction), any amendments to the
16 pleadings, any additional items of evidence, and/or for any other reason authorized by statute, rule, or
17 applicable case law. Finjan further reserves the right to rely upon the opinions of one or more experts
18 in support of its infringement contentions in accordance with the Court’s scheduling order.

19 To the maximum degree allowed by the Federal Rules of Civil Procedure and the Court’s Local
20 Rules, Finjan reserves its right to supplement, amend, modify and/or narrow this Disclosure, as
21 appropriate, as the extent of infringement becomes more fully known, the Court makes any relevant
22 rulings (including claim construction), and the case develops over the course of discovery.

23 **I. PATENT L.R. 3-1: DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT**
24 **CONTENTIONS.**

25 **A. Identification Of Asserted Claims And Applicable Subsections Of 35 U.S.C. § 271.**

26 Finjan provides the following contentions pursuant to Patent Local Rule 3-1(a):
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1 Defendant directly infringed pursuant to 35 U.S.C. § 271(a) claims 1, 15, and 41 of U.S. Pat.
 2 No. 6,154,844 (“the ‘844 Patent”), claims 1 and 9 of U.S. Patent No. 6,804,780 (“the ‘780 Patent”),
 3 claims 15 and 22 of U.S. Patent No. 7,613,926 (“the ‘926 Patent”); claims 1, 8, 14, and 19 of U.S.
 4 Patent No. 7,647,633 (“the ‘633 Patent”), claim 1 of U.S. Patent No. 8,141,154 (“the ‘154 Patent”),
 5 and claims 10, 14, and 18 of U.S. Patent No. 8,677,494 (“the ‘494 Patent”), and claims 1 and 17 of the
 6 ‘731 Patent (collectively, the “Asserted Claims”).

7 Finjan reserves the right to amend, modify, supplement, or narrow these contentions, as
 8 appropriate, pursuant to Patent Local Rule 3-6, including identifying additional asserted claims, as it
 9 obtains additional information over the course of discovery and in light of the Court’s claim
 10 construction order.

11 **B. Identification of Accused Instrumentalities.**

12 Finjan provides the following contentions pursuant to Patent Local Rule 3-1(b):

13 Finjan accuses the following of Defendant’s products and/or services, and associated software
 14 and subscriptions, of infringing claims 1, 15, and 41 of the ‘844 Patent: SRX Gateways¹, Space
 15 Security Director², Sky ATP³, ATP Appliances⁴, and Spotlight Secure service identified in the
 16 attached Appendices A-1 through A-3 (“Accused Instrumentalities of the ‘844 Patent”).

17 Finjan accuses the following of Defendant’s products and/or services, and associated software
 18 and subscriptions, of infringing claims 1 and 9 of the ‘780 Patent: SRX Gateways, Space Security
 19 Director, Sky ATP, ATP Appliances, and Spotlight Secure service, identified in the attached
 20 Appendices B-1 through B-3 (“Accused Instrumentalities of the ‘780 Patent”).

21 _____
 22 ¹ A list of accused “SRX Gateways” (also called “SRX Series Services Gateways”) are provided in
 23 Exhibit A attached hereto, and are collectively referred to as “SRX Gateways” or “SRX Series
 24 Services Gateways.”

24 ² A list of the accused “Space Security Director” products is provided in Exhibit A attached hereto, and
 25 are collectively referred to as “Space Security Director.”

25 ³ A list of the accused Sky ATP service is provided in Exhibit A attached hereto, and are collectively
 26 referred to as “Sky ATP.”

26 ⁴ A list of the accused ATP Appliance products is provided in Exhibit A attached hereto, and are
 27 collectively referred to as “ATP Appliances.”
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