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JUNIPER NETWORKS, INC.

16 **IN THE UNITED STATES DISTRICT COURT**  
17 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
18 **SAN FRANCISCO DIVISION**

20 FINJAN, INC.,  
21 Plaintiff,  
22 v.  
23 JUNIPER NETWORKS, INC.,  
24 Defendant.

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

**JOINT CLAIM CONSTRUCTION AND  
PRE-HEARING STATEMENT**

Pursuant to Patent L.R. 4-3, Plaintiff Finjan, Inc. (“Finjan”) and Defendant Juniper Networks, Inc. (“Juniper”) hereby submit this Joint Claim Construction and Pre-Hearing Statement.

**I. PATENT L.R. 4-3(A): PROPOSED CONSTRUCTION OF EACH AGREED TERM**

The parties’ agreed-upon claim constructions are provided below.

U.S. Patent No. 6,154,844		
Claim Term	Claim(s)	Agreed Construction
Downloadable	1, 15, 41	an executable application program, which is downloaded from a source computer and run on the destination computer.

U.S. Patent No. 8,677,494		
Claim Term	Claim(s)	Agreed Construction
Downloadable	10, 14, 18	an executable application program, which is downloaded from a source computer and run on the destination computer

U.S. Patent No. 6,804,780		
Claim Term	Claim(s)	Agreed Construction
Downloadable	1, 9	an executable application program, which is downloaded from a source computer and run on the destination computer.

U.S. Patent No. 7,613,926		
Claim Term	Claim(s)	Agreed Construction
Downloadable	15, 22	an executable application program, which is downloaded from a source computer and run on the destination computer.
database	15, 22	a collection of interrelated data organized according to a database schema to serve one or more applications

**II. PATENT L.R. 4-3(b): PROPOSED CONSTRUCTION OF EACH DISPUTED TERM**

The parties’ proposed additional claim constructions are provided below. All supporting evidence for the parties’ claim constructions is provided in Exhibit A. The parties reserve their rights to cite additional supporting evidence based on arguments raised in the claim construction briefs.

U.S. Patent No. 6,154,844			
Claim Term	Claim(s)	Finjan’s Proposed Construction	Juniper’s Proposed Construction
inspector	1, 15, 41	No construction necessary – Plain and ordinary meaning.	A content inspection engine located within an external computer network, that is separate from the network gateway

**U.S. Patent No. 6,154,844**

<b>Claim Term</b>	<b>Claim(s)</b>	<b>Finjan's Proposed Construction</b>	<b>Juniper's Proposed Construction</b>
before a web server makes the Downloadable available to web clients	1, 15, 41	Plain and ordinary meaning. Plain and ordinary meaning of "web client" is "an application on the computer of an end user that requests a Downloadable from the web server."	Before the Downloadable is available on a web server to be called up or forwarded to a web client

**U.S. Patent No. 7,613,926**

<b>Claim Term</b>	<b>Claim(s)</b>	<b>Finjan's Proposed Construction</b>	<b>Juniper's Proposed Construction</b>
transmitting the incoming Downloadable and a representation of the retrieved Downloadable security profile data to a destination computer, via a transport protocol transmission	15, 22	No construction necessary – Plain and ordinary meaning.	Sending the incoming Downloadable along with a representation of the retrieved Downloadable security profile data to a user/client computer, via a transport protocol transmission
a transmitter coupled with said receiver, for transmitting the incoming Downloadable and a representation of the retrieved Downloadable security profile data to a destination computer, via a transport protocol transmission	15, 22	No construction necessary – Plain and ordinary meaning.	A transmitter coupled with said receiver, for sending the incoming Downloadable along with a representation of the retrieved Downloadable security profile data to a user/client computer, via a transport protocol transmission

**U.S. Patent No. 7,647,633**

<b>Claim Term</b>	<b>Claim(s)</b>	<b>Finjan's Proposed Construction</b>	<b>Juniper's Proposed Construction</b>
mobile protection code	1, 8, 14 19	code that, at runtime, monitors	Code that itself, at runtime,

U.S. Patent No. 7,647,633			
Claim Term	Claim(s)	Finjan's Proposed Construction	Juniper's Proposed Construction
		or intercepts actually or potentially malicious code operations without modifying the code operations	monitors or intercepts actually or potentially malicious code operations
A computer program product, comprising a computer usable medium having a computer readable program code therein, the computer readable program code adapted to be executed for computer security, the method comprising:	14	The typographical error in the preamble is corrected to read:  A computer program product, comprising a computer usable medium having a computer readable program code therein, the computer readable program code adapted to be executed for computer security, comprising: providing a system...	Indefinite under <i>IPXL</i> (mixed statutory classes) and/or <i>Nautilus</i>
information-destination/downloadable-information destination	1, 8, 14, 19	Plain and ordinary meaning. The plain and ordinary meaning of the terms "information-destination" and "downloadable-information destination" is a device or process that is capable of receiving and initiating or otherwise hosting a mobile code execution.	User/client device
If the downloadable-information is determined to include executable code	1, 8	Plain and ordinary meaning.	Distinguishing between two alternative possibilities: executable code is included in the downloadable-information and executable code is not included in the downloadable-information
determining, by the computer, whether the downloadable information includes	1, 8	Plain and ordinary meaning.	Distinguishing between two alternative possibilities: executable code is included in the downloadable-information and executable

**U.S. Patent No. 7,647,633**

Claim Term	Claim(s)	Finjan's Proposed Construction	Juniper's Proposed Construction
executable code			code is not included in the downloadable-information

**U.S. Patent No. 8,141,154**

Claim Term	Claim(s)	Finjan's Proposed Construction	Juniper's Proposed Construction
A content processor (i) for processing content received over a network, the content including a call to a first function, and the call including an input, and (ii) for invoking a second function with the input, only if a security computer indicates that such invocation is safe	1	Plain and ordinary meaning.	A processor on a client computer for processing content received over a network, the content including a call to a first function, and the call including an input, and for invoking a second function with the input, only if a security computer indicates that such invocation is safe
invoking a second function with the input	1	Plain and ordinary meaning.	Executing a second function by using the input to the first function as the input to the second function
Safe	1	Plain and ordinary meaning.	Security profile does not violate the client computer's security policy

**III. PATENT L.R. 4-3(C): IDENTIFICATION OF TERMS FOR CLAIM CONSTRUCTION BRIEFING**

No.	Patent [Claim]	Term
1	'633 Patent [1, 8, 14, 19]	mobile protection code
2	'633 Patent [14]	A computer program product, comprising a computer usable medium having a computer readable program code therein, the computer readable program code adapted to be executed for computer security, the method

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