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12 *Attorneys for Defendant*  
13 JUNIPER NETWORKS, INC.

14  
15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
17 **SAN FRANCISCO DIVISION**

18 FINJAN, INC., ) Case No. 3:17-cv-05659-WHA  
19 )  
Plaintiff, ) **JUNIPER NETWORKS, INC.’S ANSWER**  
20 ) **TO FINJAN, INC.’S SECOND AMENDED**  
vs. ) **COMPLAINT FOR PATENT**  
21 ) **INFRINGEMENT AND COUNTER-**  
JUNIPER NETWORKS, INC., ) **CLAIMS**  
22 )  
Defendant. ) **DEMAND FOR JURY TRIAL**  
23 )  
24 )  
Action filed: September 29, 2017

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1 Defendant Juniper Networks, Inc. (“Juniper”) hereby submits this Answer to the Second  
2 Amended Complaint for Patent Infringement (Dkt. No. 171; the “SAC”) of plaintiff Finjan, Inc.  
3 (“Finjan”) as follows. Except as expressly admitted herein, Juniper denies each and every  
4 allegation contained in the SAC.

5 **THE PARTIES**

6 1. Juniper is without knowledge sufficient to form a belief as to the truth or falsity of  
7 the allegations contained in paragraph 1 of the SAC, and therefore Juniper denies these  
8 allegations.

9 2. Juniper admits that it is a corporation organized and existing under the laws of the  
10 State of Delaware, having a place of business at 1133 Innovation Way, Sunnyvale, California  
11 94089. Juniper admits that, for purposes of this action, Juniper may be served through its agent  
12 for service of process, CT Corporation System, at 717 W. 7<sup>th</sup> Street, Suite 930, Los Angeles,  
13 California 90017. To the extent paragraph 2 of the SAC may be construed as containing  
14 additional allegations, Juniper denies such allegations.

15 **JURISDICTION AND VENUE**

16 3. Juniper admits that the SAC purports to set forth claims for patent infringement  
17 under 35 U.S.C. § 101 *et seq.* Juniper further admits that jurisdiction is allegedly based on 28  
18 U.S.C. §§ 1331 and 1338. Except as expressly admitted herein, Juniper denies each and every  
19 allegation contained in paragraph 3 of the SAC.

20 4. Juniper admits, for purposes of this lawsuit only, that venue is proper in this  
21 District.

22 5. Juniper admits that this Court has personal jurisdiction over Juniper. Juniper  
23 admits that it regularly and continuously does business in this District. Except as expressly  
24 admitted herein, Juniper denies each and every allegation contained in paragraph 5 of the SAC.

25 **INTRADISTRICT ASSIGNMENT**

26 6. Juniper admits that pursuant to Civil Local Rule 3-2(c), this action is properly  
27 assigned on a district-wide basis because the SAC purports to allege claims for patent infringement.  
28

**FINJAN’S [ALLEGED] INNOVATIONS**

1  
2 7. Juniper is without knowledge sufficient to form a belief as to the truth or falsity of  
3 the allegations contained in paragraph 7 of the SAC, and therefore Juniper denies these  
4 allegations.

5 8. Juniper is without knowledge sufficient to form a belief as to the truth or falsity of  
6 the allegations contained in paragraph 8 of the SAC, and therefore Juniper denies these  
7 allegations.

**THE ASSERTED PATENTS**

8  
9 9. Juniper admits that a copy of what Finjan alleges to be United States Patent No.  
10 6,154,844 (“the ‘844 Patent”) was attached to the SAC as Exhibit 1. Juniper admits that Exhibit 1  
11 bears on its face the title “System And Method For Attaching A Downloadable Security Profile To  
12 A Downloadable.” Juniper admits that Exhibit 1 states on its face that the alleged invention was  
13 invented by Shlomo Touboul and Nachshon Gal. Juniper denies that the ‘844 Patent was duly or  
14 legally issued. Except as expressly admitted herein, Juniper is without knowledge or information  
15 sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 9 of  
16 the SAC, and therefore Juniper denies these allegations.

17 10. Juniper is without knowledge or information sufficient to form a belief as to the  
18 truth or falsity of the allegations contained in paragraph 10 of the SAC, and therefore Juniper  
19 denies these allegations.

20 11. Juniper denies each and every allegation contained in paragraph 11 of the SAC.

21 12. Juniper admits that a copy of what Finjan alleges to be United States Patent No.  
22 6,804,780 (“the ‘780 Patent”) was attached to the SAC as Exhibit 2. Juniper admits that Exhibit 2  
23 bears on its face the title “System And Method For Protecting A Computer And A Network From  
24 Hostile Downloadables.” Juniper admits that Exhibit 2 states on its face that the alleged invention  
25 was invented by Shlomo Touboul. Juniper denies that the ‘780 Patent was duly or legally issued.  
26 Except as expressly admitted herein, Juniper is without knowledge or information sufficient to  
27 form a belief as to the truth or falsity of the allegations contained in paragraph 12 of the SAC, and  
28 therefore Juniper denies these allegations.

1           13.     Juniper is without knowledge or information sufficient to form a belief as to the  
2 truth or falsity of the allegations contained in paragraph 13 of the SAC, and therefore Juniper  
3 denies these allegations.

4           14.     Juniper denies each and every allegation contained in paragraph 14 of the SAC.

5           15.     Juniper admits that a copy of what Finjan alleges to be United States Patent No.  
6 7,647,633 (“the ‘633 Patent”) was attached to the SAC as Exhibit 3. Juniper admits that Exhibit 3  
7 bears on its face the title “Malicious Mobile Code Runtime Monitoring System And Methods.”  
8 Juniper admits that Exhibit 3 states on its face that the alleged invention was invented by Yigal  
9 Mordechai Edery, Nimrod Itzhak Vered, David R. Kroll, and Shlomo Touboul. Juniper denies  
10 that the ‘633 Patent was duly or legally issued. Except as expressly admitted herein, Juniper is  
11 without knowledge or information sufficient to form a belief as to the truth or falsity of the  
12 allegations contained in paragraph 15 of the SAC, and therefore Juniper denies these allegations.

13           16.     Juniper is without knowledge or information sufficient to form a belief as to the  
14 truth or falsity of the allegations contained in paragraph 16 of the SAC, and therefore Juniper  
15 denies these allegations.

16           17.     Juniper denies each and every allegation contained in paragraph 17 of the SAC.

17           18.     Juniper admits that a copy of what Finjan alleges to be United States Patent No.  
18 7,613,926 (“the ‘926 Patent”) was attached to the SAC as Exhibit 4. Juniper admits that Exhibit 4  
19 bears on its face the title “Method And System For Protecting A Computer And A Network From  
20 Hostile Downloadables.” Juniper admits that Exhibit 4 states on its face that the alleged invention  
21 was invented by Yigal Mordechai Edery, Nimrod Itzhak Vered, David R. Kroll, and Shlomo  
22 Touboul. Juniper denies that the ‘926 Patent was duly or legally issued. Except as expressly  
23 admitted herein, Juniper is without knowledge or information sufficient to form a belief as to the  
24 truth or falsity of the allegations contained in paragraph 18 of the SAC, and therefore Juniper  
25 denies these allegations.

26           19.     Juniper is without knowledge or information sufficient to form a belief as to the  
27 truth or falsity of the allegations contained in paragraph 19 of the SAC, and therefore Juniper  
28 denies these allegations.

1           20.     Juniper denies each and every allegation contained in paragraph 20 of the SAC.

2           21.     Juniper admits that a copy of what Finjan alleges to be United States Patent No.  
3 8,141,154 (“the ‘154 Patent”) was attached to the SAC as Exhibit 5. Juniper admits that Exhibit 5  
4 bears on its face the title “System And Method For Inspecting Dynamically Generated Executable  
5 Code.” Juniper admits that Exhibit 5 states on its face that the alleged invention was invented by  
6 David Gruzman and Yuval Ben-Itzhak. Juniper denies that the ‘154 Patent was duly or legally  
7 issued. Except as expressly admitted herein, Juniper is without knowledge or information  
8 sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 21 of  
9 the SAC, and therefore Juniper denies these allegations.

10          22.     Juniper is without knowledge or information sufficient to form a belief as to the  
11 truth or falsity of the allegations contained in paragraph 22 of the SAC, and therefore Juniper  
12 denies these allegations.

13          23.     Juniper denies each and every allegation contained in paragraph 23 of the SAC.

14          24.     Juniper admits that a copy of what Finjan alleges to be United States Patent No.  
15 8,677,494 (“the ‘494 Patent”) was attached to the SAC as Exhibit 6. Juniper admits that Exhibit 6  
16 bears on its face the title “Malicious Mobile Code Runtime Monitoring System And Methods.”  
17 Juniper admits that Exhibit 6 states on its face that the alleged invention was invented by Yigal  
18 Mordechai Eder, Nirmrod [*sic*] Itzhak Vered, David R. Kroll, and Shlomo Touboul. Juniper  
19 denies that the ‘494 Patent was duly or legally issued. Except as expressly admitted herein,  
20 Juniper is without knowledge or information sufficient to form a belief as to the truth or falsity of  
21 the allegations contained in paragraph 24 of the SAC, and therefore Juniper denies these  
22 allegations.

23          25.     Juniper is without knowledge or information sufficient to form a belief as to the  
24 truth or falsity of the allegations contained in paragraph 25 of the SAC, and therefore Juniper  
25 denies these allegations.

26          26.     Juniper denies each and every allegation contained in paragraph 26 of the SAC.

27          27.     Juniper admits that a copy of what Finjan alleges to be United States Patent No.  
28 7,418,731 (“the ‘731 Patent”) was attached to the SAC as Exhibit 7. Juniper admits that Exhibit 7

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