

EXHIBIT 4

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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 FIRST
)	AMENDED ANSWER TO FINJAN, INC.'S
20 vs.)	SECOND AMENDED COMPLAINT FOR
)	PATENT INFRINGEMENT AND
21 JUNIPER NETWORKS, INC.,)	COUNTER-CLAIMS
)	
22 Defendant.)	DEMAND FOR JURY TRIAL
)	
)	
)	Action filed: September 29, 2017

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1 Defendant Juniper Networks, Inc. (“Juniper”) hereby submits this First Amended Answer
2 to the Second Amended Complaint for Patent Infringement (Dkt. No. 171; the “SAC”) of
3 ~~plaintiff~~Plaintiff Finjan, Inc. (“Finjan”) as follows. Except as expressly admitted herein, Juniper
4 denies each and every 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. 7th 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.

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JUNIPER'S FIRST AMENDED ANSWER

FINJAN’S [ALLEGED] INNOVATIONS

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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

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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
11 1 bears on its face the title “System And Method For Attaching A Downloadable Security Profile
12 To A Downloadable.” Juniper admits that Exhibit 1 states on its face that the alleged invention
13 was invented by Shlomo Touboul and Nachshon Gal. Juniper denies that the ‘844 Patent was
14 duly or legally issued. Except as expressly admitted herein, Juniper is without knowledge or
15 information sufficient to form a belief as to the truth or falsity of the allegations contained in
16 paragraph 9 of 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
23 2 bears on its face the title “System And Method For Protecting A Computer And A Network
24 From Hostile Downloadables.” Juniper admits that Exhibit 2 states on its face that the alleged
25 invention was invented by Shlomo Touboul. Juniper denies that the ‘780 Patent was duly or
26 legally issued. Except as expressly admitted herein, Juniper is without knowledge or information
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1 sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 12 of
2 the SAC, and therefore Juniper denies these allegations.

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

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

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

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

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

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

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JUNIPER'S FIRST AMENDED ANSWER

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