

1 PAUL J. ANDRE (State Bar No. 196585)
pandre@kramerlevin.com
2 LISA KOBIALKA (State Bar No. 191404)
lkobialka@kramerlevin.com
3 JAMES HANNAH (State Bar No. 237978)
jhannah@kramerlevin.com
4 KRISTOPHER KASTENS (State Bar No. 254797)
kkastens@kramerlevin.com
5 KRAMER LEVIN NAFTALIS & FRANKEL LLP
6 990 Marsh Road
7 Menlo Park, CA 94025
8 Telephone: (650) 752-1700
Facsimile: (650) 752-1800

IRELL & MANELLA LLP
Jonathan S. Kagan (SBN 166039)
jkagan@irell.com
Joshua Glucoft (SBN 301249)
jglucoft@irell.com
Casey Curran (SBN 305210)
ccurran@irell.com
Sharon Song (SBN 313535)
ssong@irell.com
1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067-4276
Telephone: (310) 277-1010
Facsimile: (310) 203-7199

9 *Attorneys for Plaintiff*
10 FINJAN, INC.

Rebecca Carson (SBN 254105)
rcarson@irell.com
Kevin Wang (SBN 318024)
kwang@irell.com
840 Newport Center Drive, Suite 400
Newport Beach, California 92660-6324
Telephone: (949) 760-0991
Facsimile: (949) 760-5200

11
12
13
14 *Attorneys for Defendant*

15 JUNIPER NETWORKS, INC.

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

19
20 FINJAN, INC.,
21 Plaintiff,
22 v.
23 JUNIPER NETWORKS, INC.,
24 Defendant.

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

**SUPPLEMENTAL 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 Supplemental 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
database	10	a collection of interrelated data organized according to a database schema to serve one or more applications

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	A content inspection engine located within an external

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

Claim Term	Claim(s)	Finjan's Proposed Construction	Juniper's Proposed Construction
		meaning.	computer network, that is separate from the network gateway
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

Claim Term	Claim(s)	Finjan's Proposed Construction	Juniper's Proposed Construction
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

Claim Term	Claim(s)	Finjan's Proposed Construction	Juniper's Proposed Construction
mobile protection code	1, 8, 14 19	code that, at runtime, monitors or intercepts actually or potentially malicious code operations without modifying the code operations	Code that itself, at runtime, 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	1, 8	Plain and ordinary meaning.	Distinguishing between two alternative possibilities: executable code is included in

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

Claim Term	Claim(s)	Finjan's Proposed Construction	Juniper's Proposed Construction
includes executable code			the downloadable-information and executable 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

U.S. Patent No. 7,418,731

Claim Term	Claim(s)	Finjan's Proposed Construction	Juniper's Proposed Construction
a file cache for storing files that have been scanned by the	1	No construction necessary – Plain and ordinary meaning.	A file cache for storing files that have been scanned by the scanner for use in response to

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.