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13 JUNIPER NETWORKS, INC.

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

18 FINJAN, INC., a Delaware Corporation,) Case No. 3:17-cv-05659-WHA
19)
Plaintiff,) **JUNIPER NETWORKS, INC.’S INITIAL**
20) **ELECTION OF PRIOR ART GROUNDS**
v.)
21) Hon. William Alsup
JUNIPER NETWORKS, INC., a Delaware)
22)
Corporation,)
23)
Defendant.)
_____)

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1 Juniper Networks, Inc. (“Juniper”) hereby submits its Initial Election of Prior Art
2 Combinations, which identifies no more than 6 anticipation/obviousness grounds per patent up to a
3 total 35 grounds. Exhibits referenced below are exhibits to Juniper’s invalidity contentions. Juniper
4 reserves the right to amend its selections based upon, for example, any amendments to Finjan, Inc.’s
5 (“Finjan”) infringement contentions, any amendments made by Finjan to its narrowing of patent
6 claims, Finjan’s positions on claim construction, the Court’s Markman ruling on disputed claim
7 terms, and/or any discovery violations by Finjan relevant to the invalidity of the asserted patents.
8 Juniper also reserves the right for Juniper or its experts to explain how certain modifications of the
9 prior art cited in the below references and combinations would have been obvious in light of the
10 knowledge of those of ordinary skill in the art as demonstrated by the state of the art as of the time
11 of the alleged inventions.

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

- 13 1. SurfinGate available from Finjan, Inc. (“SurfinGate”)
- 14 2. U.S. Patent No. 6,253,370 (“Abadi”)
- 15 3. Abadi + Gryaznov, *Scanners of the Year 2000: Heuristics*, Virus Bulletin Conference
16 (September 1995) (“Gryaznov”)
- 17 4. Islam et al., *A Flexible Security Model for Using Internet Content*, IBM Thomas J.
18 Watson Research Center (September/October 1997) (“Islam”) + U.S. Patent No.
19 5,983,348 (“Ji 348”)
- 20 5. Islam + U.S. Patent No. 6,088,801 (“Grecsek”)
- 21 6. U.S. Patent No. 6,157,721 (“Shear”) + Gryaznov

22 **U.S. Patent No. 6,804,780**

- 23 1. Browne et al., *Location-Independent Naming for Virtual Distributed Software*
24 *Repositories* (1995) (“Browne95”) + U.S. Patent No. 5,835,777 (“Staelin”)
- 25 2. Browne95 + Lewis et al., *Threads Primer* (October 31, 1995) (“Lewis”)
- 26 3. U.S. Patent No. 5,748,960 (“Fischer 960”) + U.S. Patent No. 5,732,275 (“Kullick”)

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

- 2 1. Jensen and Hagimont, *Protection Wrappers: A Simple and Portable Sandbox for*
3 *Untrusted Applications*, 8th ACM SIGOPS European Workshop (September 10,
4 1998) (“Jensen”) + U.S. Patent No. 7,076,650 (“Sonnenberg”)
5 2. WO 98/31124 to Hanson et al. (“Hanson”) + U.S. Patent No. 6,065,118 (“Bull”)
6 3. Jensen + U.S. Patent No. 6,119,165 (“Li”)
7 4. Hanson + U.S. Patent No. 6,577,920 (“Hypponen”)
8 5. Jensen + Ji 348

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

- 10 1. Ji 348 + U.S. Patent No. 7,594,267 (“Gladstone”)
11 2. Chander et al., *Mobile Code Security by Java Bytecode Instrumentation*, DARPA
12 Information Survivability Conference & Exposition II, 2001, DISCEX ’01
13 (“Chander”) + Gladstone
14 3. U.S. Patent Publication No. 2007/0113282 A1 (“Ross”)
15 4. Ross + Ji 348
16 5. Ross + Chander

17 **U.S. Patent No. 8,677,494**

- 18 1. SurfinGate
19 2. Swimmer, *Dynamic Detection and Classification of Computer Viruses Using*
20 *General Behavior Patterns* (“Swimmer”) + Taylor, *SQL for Dummies* (1995) (“SQL
21 for Dummies”)
22 3. Swimmer + Mounji, *Preliminary Report on Distributed ASAX* (March 27, 1994)
23 (“Mounji”) + Lunt et al., *A Prototype Real-Time Intrusion-Detection Expert System*
24 (1988) (“Lunt”)
25 4. Crawford et al., *Automated Assistance for Detecting Malicious Code* (June 18, 1993)
26 (“Crawford 93”) + SQL for Dummies
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- 1 5. U.S. Patent No. 5,832,208 (“Chen-Luo”) + Stang, *Computer Viruses and Artificial*
- 2 *Intelligence* (September 1995) (“Stang”) + Haritsa et al., *MANDATE: MANaging*
- 3 *Networks Using DAtabase Technology* (December 1993) (“HaritsaIEEE”)
- 4 6. Dr. Solomon’s Anti-Virus Toolkit available from S&S International PLC
- 5 (“DSAVT”) + Stang + SQL for Dummies

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

- 7 1. Islam + Browne95
- 8 2. Islam + Browne95 + Boisvert et al., *Digital Software and Data Repositories for*
- 9 *Support of Scientific Computing* (1995) (“Boisvert”)
- 10 3. U.S. Patent No. 6,128,774 (“Necula”) + Browne95
- 11 4. Necula + Browne95 + Boisvert

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

- 13 1. SurfinGate
- 14 2. Islam + Grecsek + Thomson, *Proxy Servers and Databases for Managing Web-based*
- 15 *Information* (May 1997) (“Thomson”)
- 16 3. Islam + Grecsek + Thomson + Papaj et al., *Oracle Databases on the Web* (February
- 17 10, 1997) (“Papaj”)
- 18 4. U.S. Patent No. 6,088,803 (“Tso 803”) + Grecsek
- 19 5. Tso 803 + Grecsek + Islam
- 20 6. Shear + Thomson

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Respectfully submitted,
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