

EXHIBIT 2

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

8 Rebecca Carson (SBN 254105)
rcarson@irell.com
9 Kevin Wang (SBN 318024)
kwang@irell.com
10 840 Newport Center Drive, Suite 400
Newport Beach, California 92660-6324
11 Telephone: (949) 760-0991
12 Facsimile: (949) 760-5200

13 *Attorneys for Defendant*
JUNIPER NETWORKS, INC.

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

17 FINJAN, INC., a Delaware Corporation,) Case No. 3:17-CV-05659-WHA
18)
19 Plaintiff,) JUNIPER NETWORKS, INC.’S NOTICE OF
20 vs.) SPECIFIC UNMARKED PRODUCTS
21) UNDER ARCTIC CAT, INC. V.
22) BOMBARDIER RECREATIONAL
23)
24)
25)
26)
27)
28)
29)
30)
31)
32)
33)
34)
35)
36)
37)
38)
39)
40)
41)
42)
43)
44)
45)
46)
47)
48)
49)
50)
51)
52)
53)
54)
55)
56)
57)
58)
59)
60)
61)
62)
63)
64)
65)
66)
67)
68)
69)
70)
71)
72)
73)
74)
75)
76)
77)
78)
79)
80)
81)
82)
83)
84)
85)
86)
87)
88)
89)
90)
91)
92)
93)
94)
95)
96)
97)
98)
99)
100)

24 In *Arctic Cat Inc. v. Bombardier Recreational Products*, 876 F.3d 1350, 1368 (Fed. Cir.
25 2017), the Federal Circuit held that an alleged infringer may meet its burden of production with
26 respect to a marking defense by “putting the patentee on notice that he or his authorized licensees
27 sold specific unmarked products which the alleged infringer believes practice the patent.”
28 Defendant Juniper Networks, Inc. (“Juniper”) hereby puts Plaintiff Finjan, Inc. (“Finjan”) on

1 notice that Juniper contends that the following Finjan and licensee products are “patented articles”
 2 for which Finjan has the burden of proving compliance with 35 U.S.C. § 287. Juniper notes that,
 3 for some of the licensees, Juniper is unable to identify specific products at this time because Finjan
 4 has not provided a complete production of documents related to its licenses and negotiations with
 5 third parties. Juniper intends to supplement this notice when Finjan complies with its discovery
 6 obligations.

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

- 8 • **Finjan, Inc.:** SurfinGate Products, SurfinShield Products, Vital Security Products
- 9 • **Proofpoint, Inc.:** Proofpoint Malware Analysis Service, Proofpoint Targeted
 10 Attack Protection
- 11 • **Webroot Inc.:** Webroot Web Security Software Products, Webroot Email Security
 12 Products
- 13 • **Aladdin Knowledge Systems, Inc.:** eSafe Products
- 14 • **F5 Networks, Inc.:** WebSafe Products, MobileSafe Products, BIG-IP Application
 15 Security Manager Products, Silverline Web Application Firewall Products, BIG-IP
 16 Secure Web Gateway Services Products, Silverline Threat Intelligence Products
- 17 • **AVAST Software, Inc.:** AVG Antivirus Products, AVG CloudCare Products,
 18 AVG Internet Security Products, AVG Ultimate Products
- 19 • **Licensed products from Panda Security, Barracuda Networks, Inc., F-Secure
 20 Corporation, Microsoft Corporation, Intel Corporation, McAfee, Inc., M86
 21 Security, and Trustwave**

22 **U.S. Patent No. 8,677,494:**

- 23 • **Finjan, Inc:** Vital Security Products
- 24 • **Websense, Inc.:** TRITON Products, Websense Web Security Gateway Products,
 25 Websense Data Security Products, Websense CyberSecurity Intelligence Service
- 26 • **F5 Networks, Inc.:** WebSafe Products, MobileSafe Products, BIG-IP Application
 27 Security Manager Products, Silverline Web Application Firewall Products, BIG-IP
 28 Secure Web Gateway Services Products, Silverline Threat Intelligence Products

- 1 • **Proofpoint, Inc.:** Proofpoint Malware Analysis Service, Proofpoint Targeted
2 Attack Protection
- 3 • **Webroot Inc.:** Webroot Web Security Software Products, Webroot Email Security
4 Products, Webroot Spy Sweeper Products, Webroot AntiVirus with Spy Sweeper
5 Products, Webroot Internet Security Essentials Products
- 6 • **Aladdin Knowledge Systems, Inc.:** eSafe Products
- 7 • **Licensed products from Panda Security, Barracuda Networks, Inc., F-Secure**
8 **Corporation, Microsoft Corporation, Intel Corporation, McAfee, Inc., M86**
9 **Security, and Trustwave**

10 **U.S. Patent No. 6,804,780:**

- 11 • **Finjan, Inc.:** Vital Security Products
- 12 • **WebWasher** (currently owned by McAfee, Inc.): WebWasher SCM Suite Products
- 13 • **Sophos, Inc.:** Sophos Live Protection Products
- 14 • **Aladdin Knowledge Systems, Inc.:** eSafe Products
- 15 • **Webroot Inc.:** Webroot Web Security Software Products, Webroot Email Security
16 Products
- 17 • **Licensed products from Veracode, Inc., Avira Holding GmbH & Co. KG,**
18 **Panda Security, Barracuda Networks, Inc., AVAST, F-Secure Corporation,**
19 **Microsoft Corporation, Intel Corporation, McAfee, Inc., M86 Security, and**
20 **Trustwave**

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

- 22 • **Proofpoint, Inc.:** Proofpoint HackAlert Products, Proofpoint Targeted Attack
23 Protection Products
- 24 • **Websense, Inc.:** TRITON Products, Websense Web Security Gateway Products,
25 Websense Data Security Products, Websense CyberSecurity Intelligence Service,
26 Websense ThreatSeeker Network, Websense Products and Services using ACE
- 27 • **FireEye, Inc.:** NX Series Products (including Web MPS Products and cloud
28 versions), EX Series (including Email MPS Products and cloud versions), AX

1 Series (including MAS Products), Central Management System, FireEye's
 2 Dynamic Threat Intelligence Cloud (also known as MPC, ATI, ATI+, iSight)

- 3 • **Blue Coat Systems, Inc.:** ProxySG Appliances and Software
- 4 • **Licensed products from Veracode, Inc., Avira Holding GmbH & Co. KG,**
- 5 **Panda Security, Barracuda Networks, Inc., F-Secure Corporation, Microsoft**
- 6 **Corporation, McAfee, Inc., Intel Corporation, M86 Security, and Trustwave**

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

- 8 • **Proofpoint, Inc.:** Proofpoint HackAlert Products, Proofpoint CodeSecure Products
- 9 • **Websense, Inc.:** TRITON Products, Websense Web Security Gateway Products,
- 10 Websense Data Security Products, Websense CyberSecurity Intelligence Service,
- 11 Websense ThreatSeeker Network, Websense Products and Services using ACE
- 12 • **F5 Networks, Inc.:** BIG-IP Application Security Manager Products, Silverline
- 13 Web Application Firewall Products
- 14 • **AVAST Software, Inc.:** AVG Antivirus Products, AVG CloudCare Products,
- 15 AVG Internet Security Products, AVG Ultimate Products
- 16 • **Sophos, Inc.:** Sophos Live Protection Products, Sophos Advanced Threat
- 17 Protection Products
- 18 • **Symantec Corp.:** SONAR with Insight and Norton Security Products
- 19 • **FireEye, Inc.:** NX Series Products (including Web MPS Products and cloud
- 20 versions), EX Series (including Email MPS Products and cloud versions), AX
- 21 Series (including MAS Products), Central Management System, FireEye's
- 22 Dynamic Threat Intelligence Cloud (also known as MPC, ATI, ATI+, iSight)
- 23 • **Carbon Black, Inc.:** Cb Predictive Security Cloud, Cb Response, Cb Defense, Cb
- 24 Defense for VMware, and Cb Protection (formerly known as Carbon Black
- 25 Enterprise Protection/Bit9 Security Platform/Bit9 Party Suite)
- 26 • **Licensed products from Veracode, Inc., Avira Holding GmbH & Co. KG,**
- 27 **Panda Security, Barracuda Networks, Inc., F-Secure Corporation, M86**
- 28

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.