

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JUNIPER NETWORKS, INC.,
Petitioner,

v.

FINJAN, INC.,
Patent Owner.

Case IPR2019-00031
Patent 8,141,154

**PATENT OWNER'S PRELIMINARY RESPONSE
UNDER 37 C.F.R. § 42.107**

identify any capability in either Ji or Gladstone to “inspect” a function input, let alone a security computer that inspects a transmitted input. Although Ji discloses that “parameters to the suspicious function” are passed to the pre-filter, Ji is silent with respect to **inspecting** those parameters. *See* Ji at 5:57–62. Additionally, Gladstone’s Event Processing Server only processes event messages, which as discussed above, are not function inputs. Accordingly, Petitioner’s proposed combination of Ji and Gladstone does not result in “**transmitting the input to the security computer for inspection**, when the first function is invoked.” ‘154 Patent, claim 1 (emphasis added).

Second, this argument requires modification to Ji and Gladstone such that function inputs are transmitted as a result of the invocation of a first function whose call includes the input. As acknowledged by Petitioner, Ji’s pre-filter is executed locally, and no input is transmitted anywhere. *See* Petition at 18 (showing that the “safety check” occurs on the client machine). Gladstone does not cure this deficiency because it only transmits event messages as a result of encountering an operating system event, not as a result of invoking a first function. In other words, Petitioner’s proposed combination of Ji and Gladstone does not result in “transmitting the input to the security computer for inspection, **when the first function is invoked**.” ‘154 Patent, claim 1 (emphasis added).