

Exhibit D

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

9 *Attorneys for Plaintiff*
10 FINJAN, INC.

11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

15 FINJAN, INC.,

16 Plaintiff,

17 v.

18 JUNIPER NETWORKS, INC.,

19 Defendant.

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

**FINJAN, INC.'S PRELIMINARY CLAIM
CONSTRUCTIONS PURSUANT TO
PATENT LOCAL RULE 4-2**

'926 Terms For Construction	Citations to Intrinsic Record and Extrinsic Evidence	Proposed Constructions
	<p>Col. 6, ll. 15-23; Col. 6, ll. 5-67; Col. 7, ll. 1-59; Col. 9, ll. 11-34, 58-67; and Col. 10, ll. 1-21.</p> <p><i>Symantec Corp. v. Finjan, Inc.</i>, IPR2015-01893.</p> <p><i>Symantec Corp. v. Finjan, Inc.</i>, IPR2015-01895.</p> <p><i>Palo Alto Networks, Inc. v. Finjan, Inc.</i>, IPR2016-00145.</p> <p><u>Extrinsic Evidence</u> Testimony from Dr. Nenad Medvidovic regarding the meaning of the term “database” as “a collection of interrelated data organized according to a database schema to serve one or more applications” from the perspective of one of skill in the art based on the intrinsic record and extrinsic evidence.</p> <p>August 12, 2014, Joint Claim Construction and Pre-Hearing Statement Pursuant to Patent Local Rule 4-3, <i>Finjan, Inc. v. Websense, Inc.</i>, Civ. No. 13-cv-04398-BLF.</p> <p><u>Dictionary/Treatise Definitions</u> IBM Dictionary of Computing, Tenth Edition, published 1994 by McGraw-Hill, Inc. and edited by George McDaniel.</p> <p>Any intrinsic and extrinsic evidence relied upon by Juniper.</p> <p>Juniper’s Invalidation Contentions.</p>	

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28