

1 IRELL & MANELLA LLP  
2 Jonathan S. Kagan (SBN 166039)  
jkagan@irell.com  
3 Alan Heinrich (SBN 212782)  
aheinrich@irell.com  
4 Joshua Glucoft (SBN 301249)  
jglucoft@irell.com  
1800 Avenue of the Stars, Suite 900  
5 Los Angeles, California 90067-4276  
Telephone: (310) 277-1010  
6 Facsimile: (310) 203-7199

7 Rebecca Carson (SBN 254105)  
rcarson@irell.com  
8 Ingrid M. H. Petersen (SBN 313927)  
ipetersen@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  
Facsimile: (949) 760-5200

12

13 *Attorneys for Defendant*  
JUNIPER NETWORKS, INC.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

18 FINJAN, INC., a Delaware Corporation, ) Case No. 3:17-cv-05659-WHA  
19 Plaintiff, )  
20 vs. )  
21 JUNIPER NETWORKS, INC., a Delaware )  
Corporation, )  
22 Defendant. )  
23 \_\_\_\_\_ )  
 ) JUNIPER NETWORKS, INC.'S  
 ) NOTICE OF MOTION AND MOTION  
 ) FOR SANCTIONS  
 ) Date: May 2, 2019  
 ) Time: 8:00 AM  
 ) Courtroom: 12, 19th Floor  
 ) Before: Hon. William Alsup

## **NOTICE OF MOTION**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

3 PLEASE TAKE NOTICE that on May 2, 2019, at 8:00 a.m., or as soon thereafter as the  
4 matter may be heard, in Courtroom 12, 19th Floor, of the San Francisco Courthouse, 450 Golden  
5 Gate Avenue, San Francisco, California 94102, before the Honorable William Alsup, Defendant  
6 Juniper Networks, Inc. (“Juniper”) will and hereby does move for an order sanctioning Finjan, Inc.  
7 (“Finjan”). This motion is based on: this Notice of Motion; the Memorandum of Points and  
8 Authorities below; the Declaration of Rebecca Carson and exhibits attached thereto; and such other  
9 written or oral argument as may be presented at or before the time this motion is heard by the Court.

**STATEMENT OF RELIEF REQUESTED**

11 Juniper seeks an order sanctioning Finjan based on its conduct during and as a result of the  
12 first round of early motions for summary judgment. Juniper believes that the amount of such  
13 sanction should be commensurate with the amount of resources Juniper and the Court were required  
14 to waste defending against improper infringement, validity, and damages positions, and it is  
15 prepared to submit a proposal to the Court if the Court believes such a proposal would be appropriate  
16 and useful.

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