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10 *Attorneys for Defendant*  
11 JUNIPER NETWORKS, INC.

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO DIVISION**

15 FINJAN, INC., ) Case No. 3:17-cv-05659-WHA  
16 )  
Plaintiff, ) **JUNIPER NETWORKS, INC.’S ANSWER**  
17 ) **TO FINJAN, INC.’S COMPLAINT FOR**  
vs. ) **PATENT INFRINGEMENT AND**  
18 ) **COUNTER-CLAIMS**  
JUNIPER NETWORKS, INC., )  
19 )  
Defendant. ) **DEMAND FOR JURY TRIAL**  
20 )  
21 )  
Action filed: September 29, 2017  
22 )  
23 )  
24 )  
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26 )  
27 )  
28 )

1 Defendant Juniper Networks, Inc. (“Juniper”) hereby submits this Answer to the  
2 Complaint for Patent Infringement (Dkt. No. 1, the “Complaint”) of plaintiff Finjan, Inc.  
3 (“Finjan”) as follows.

4 **THE PARTIES**

5 1. Juniper is without knowledge sufficient to form a belief as to the truth or falsity of  
6 the allegations contained in paragraph 1 of the Complaint, and therefore Juniper denies these  
7 allegations.

8 2. Juniper admits that it is a corporation organized and existing under the laws of the  
9 State of Delaware, having a place of business at 1133 Innovation Way, Sunnyvale, California  
10 94089. Juniper admits that, for purposes of this action, Juniper may be served through its agent  
11 for service of process, CT Corporation System, at 717 W. 7<sup>th</sup> Street, Suite 930, Los Angeles,  
12 California 90017. To the extent paragraph 2 of the Complaint may be construed as containing  
13 additional allegations, Juniper denies such allegations.

14 **JURISDICTION AND VENUE**

15 3. Juniper admits that the Complaint purports to set forth claims for patent  
16 infringement under 35 U.S.C. § 101 *et seq.* Juniper further admits that jurisdiction is allegedly  
17 based on 28 U.S.C. §§ 1331 and 1338. Except as expressly admitted herein, Juniper denies each  
18 and every allegation contained in paragraph 3 of the Complaint.

19 4. Juniper admits, for purposes of this lawsuit only, that venue is proper in this  
20 District.

21 5. Juniper admits that this Court has personal jurisdiction over Juniper. Juniper  
22 admits that it regularly and continuously does business in this District. Except as expressly  
23 admitted herein, Juniper denies each and every allegation contained in paragraph 5 of the  
24 Complaint.

25 **INTRADISTRICT ASSIGNMENT**

26 6. Juniper admits that, pursuant to Civil Local Rule 3-2(c), this action is properly  
27 assigned on a district-wide basis because the Complaint purports to allege claims for patent  
28 infringement.

**FINJAN’S [ALLEGED] INNOVATIONS**

1  
2 7. Juniper is without knowledge sufficient to form a belief as to the truth or falsity of  
3 the allegations contained in paragraph 7 of the Complaint, and therefore Juniper denies these  
4 allegations.

5 8. Juniper is without knowledge sufficient to form a belief as to the truth or falsity of  
6 the allegations contained in paragraph 8 of the Complaint, and therefore Juniper denies these  
7 allegations.

**THE ASSERTED PATENTS**

8  
9 9. Juniper admits that a copy of what Finjan alleges to be United States Patent No.  
10 6,154,844 (“the ‘844 Patent”) was attached to the Complaint as Exhibit 1. Juniper admits that  
11 Exhibit 1 bears on its face the title “System And Method For Attaching A Downloadable Security  
12 Profile To A Downloadable.” Juniper admits that Exhibit 1 states on its face that the alleged  
13 invention was invented by Shlomo Touboul and Nachshon Gal. Juniper denies that the ‘844  
14 Patent was duly or legally issued. Except as expressly admitted herein, Juniper is without  
15 knowledge or information sufficient to form a belief as to the truth or falsity of the allegations  
16 contained in paragraph 9 of the Complaint, and therefore Juniper denies these allegations.

17 10. Juniper is without knowledge or information sufficient to form a belief as to the  
18 truth or falsity of the allegations contained in paragraph 10 of the Complaint, and therefore Juniper  
19 denies these allegations.

20 11. Juniper denies each and every allegation contained in paragraph 11 of the  
21 Complaint.

22 12. Juniper admits that a copy of what Finjan alleges to be United States Patent No.  
23 6,804,780 (“the ‘780 Patent”) was attached to the Complaint as Exhibit 2. Juniper admits that  
24 Exhibit 2 bears on its face the title “System And Method For Protecting A Computer And A  
25 Network From Hostile Downloadables.” Juniper admits that Exhibit 2 states on its face that the  
26 alleged invention was invented by Shlomo Touboul. Juniper denies that the ‘780 Patent was duly  
27 or legally issued. Except as expressly admitted herein, Juniper is without knowledge or  
28

1 information sufficient to form a belief as to the truth or falsity of the allegations contained in  
2 paragraph 12 of the Complaint, and therefore Juniper denies these allegations.

3 13. Juniper is without knowledge or information sufficient to form a belief as to the  
4 truth or falsity of the allegations contained in paragraph 13 of the Complaint, and therefore Juniper  
5 denies these allegations.

6 14. Juniper denies each and every allegation contained in paragraph 14 of the  
7 Complaint.

8 15. Juniper admits that a copy of what Finjan alleges to be United States Patent No.  
9 7,647,633 (“the ‘633 Patent”) was attached to the Complaint as Exhibit 3. Juniper admits that  
10 Exhibit 3 bears on its face the title “Malicious Mobile Code Runtime Monitoring System And  
11 Methods.” Juniper admits that Exhibit 3 states on its face that the alleged invention was invented  
12 by Yigal Mordechai Edery, Nimrod Itzhak Vered, David R. Kroll, and Shlomo Touboul. Juniper  
13 denies that the ‘633 Patent was duly or legally issued. Except as expressly admitted herein,  
14 Juniper is without knowledge or information sufficient to form a belief as to the truth or falsity of  
15 the allegations contained in paragraph 15 of the Complaint, and therefore Juniper denies these  
16 allegations.

17 16. Juniper is without knowledge or information sufficient to form a belief as to the  
18 truth or falsity of the allegations contained in paragraph 16 of the Complaint, and therefore Juniper  
19 denies these allegations.

20 17. Juniper denies each and every allegation contained in paragraph 17 of the  
21 Complaint.

22 18. Juniper admits that a copy of what Finjan alleges to be United States Patent No.  
23 7,613,926 (“the ‘926 Patent”) was attached to the Complaint as Exhibit 4. Juniper admits that  
24 Exhibit 4 bears on its face the title “Method And System For Protecting A Computer And A  
25 Network From Hostile Downloadables.” Juniper admits that Exhibit 4 states on its face that the  
26 alleged invention was invented by Yigal Mordechai Edery, Nimrod Itzhak Vered, David R. Kroll,  
27 and Shlomo Touboul. Juniper denies that the ‘926 Patent was duly or legally issued. Except as  
28 expressly admitted herein, Juniper is without knowledge or information sufficient to form a belief

1 as to the truth or falsity of the allegations contained in paragraph 18 of the Complaint, and  
2 therefore Juniper denies these allegations.

3 19. Juniper is without knowledge or information sufficient to form a belief as to the  
4 truth or falsity of the allegations contained in paragraph 19 of the Complaint, and therefore Juniper  
5 denies these allegations.

6 20. Juniper denies each and every allegation contained in paragraph 20 of the  
7 Complaint.

8 21. Juniper admits that a copy of what Finjan alleges to be United States Patent No.  
9 8,141,154 (“the ‘154 Patent”) was attached to the Complaint as Exhibit 5. Juniper admits that  
10 Exhibit 5 bears on its face the title “System And Method For Inspecting Dynamically Generated  
11 Executable Code.” Juniper admits that Exhibit 5 states on its face that the alleged invention was  
12 invented by David Gruzman and Yuval Ben-Itzhak. Juniper denies that the ‘154 Patent was duly  
13 or legally issued. Except as expressly admitted herein, Juniper is without knowledge or  
14 information sufficient to form a belief as to the truth or falsity of the allegations contained in  
15 paragraph 21 of the Complaint, and therefore Juniper denies these allegations.

16 22. Juniper is without knowledge or information sufficient to form a belief as to the  
17 truth or falsity of the allegations contained in paragraph 22 of the Complaint, and therefore Juniper  
18 denies these allegations.

19 23. Juniper denies each and every allegation contained in paragraph 23 of the  
20 Complaint.

21 24. Juniper admits that a copy of what Finjan alleges to be United States Patent No.  
22 8,677,494 (“the ‘494 Patent”) was attached to the Complaint as Exhibit 6. Juniper admits that  
23 Exhibit 6 bears on its face the title “Malicious Mobile Code Runtime Monitoring System And  
24 Methods.” Juniper admits that Exhibit 6 states on its face that the alleged invention was invented  
25 by Yigal Mordechai Edery, Nirmrod [sic] Itzhak Vered, David R. Kroll, and Shlomo Touboul.  
26 Juniper denies that the ‘494 Patent was duly or legally issued. Except as expressly admitted  
27 herein, Juniper is without knowledge or information sufficient to form a belief as to the truth or  
28

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