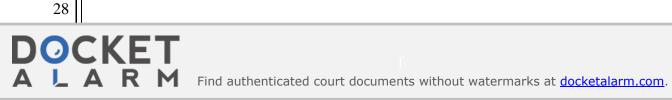
1	PAUL ANDRE (State Bar No. 196585)							
2	pandre@kramerlevin.com							
3	LISA KOBIALKA (State Bar No. 191404)							
4	lkobialka@kramerlevin.com JAMES HANNAH (State Bar No. 237978)							
	jhannah@kramerlevin.com							
5	KRISTOPHER KASTENS (State Bar No. 254797) kkastens@kramerlevin.com							
6	KRAMER LEVIN NAFTALIS & FRANKEL LLP							
7	990 Marsh Road Menlo Park, CA 94025							
8	Telephone: (650) 752-1700							
	Facsimile: (650) 752-1800							
9	Attorneys for Plaintiff							
10	FINJAN, INC.							
11	IN THE UNITED STA	TEC DISTRIC	T CAUDT					
12	IN THE UNITED STATES DISTRICT COURT							
13	FOR THE NORTHERN DISTRICT OF CALIFORNIA							
14	SAN FRANCISCO DIVISION							
15	FINJAN, INC., a Delaware Corporation,	Case No.: 3:1	7-cv-05659-WHA					
16	Plaintiff,	PLAINTIFF	FINJAN, INC.'S REPLY IN					
17	,	SUPPORT O	F ITS MOTION FOR RELIEF					
18	v.	FROM JUDO CIV. P. 60(B	GMENT PURSUANT TO FED. R.					
19	JUNIPER NETWORKS, INC., a Delaware	C17.1.00(D	,					
20	Corporation,	Date:	May 9, 2019					
20	Defendant.	Time: Courtroom:	8:00 a.m. 12, 19th Floor					
21		Before:	Hon. William H. Alsup					
22								
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I. INTRODUCTION

Finjan is entitled to relief from the jury verdict entered on December 14, 2018 (Dkt. No. 333, "Verdict") and this Court's subsequent order denying Finjan's Motion for Judgment as a Matter of Law on March 11, 2019 (Dkt. No. 387, "Order") because but for Juniper's fraudulent concealment of key evidence that proved that Sky ATP had a "database" as recited in Claim 10 of U.S. Patent No. 8,677,494 ("the '494 Patent"), which was the pivotal issue at the December 2018 trial, the jury would have found infringement. Finjan repeatedly requested such information in discovery for months before trial, but Juniper misrepresented that it had completed its production and stymied Finjan's diligent efforts to obtain this evidence. Juniper thus prevented the jury from carrying out its civic duty to consider all the evidence before it, interfered with the Court's ability to dispense justice, and deprived Finjan of a fair trial on the merits of its infringement claim. Incredibly, Juniper filed a Motion for Sanctions (Dkt. No. 409), but its unsupported complaints are swallowed by Juniper's *months* of discovery misconduct. In fact, Juniper does not reasonably dispute that Finjan requested specific documents from Juniper about Joe Security and Joe Sandbox, that Juniper had them and did not provide them because it said its production was complete, and that the database evidenced in these documents stores dynamic analysis results in the *exact* manner Juniper's expert testified was required.

Juniper offers a handful of citations that are devoid of the technical information found in the documents Finjan had long requested, in order to allege that Finjan could have intuited what Juniper was withholding and thus sought it through subpoena or court intervention. These citations, however, do not eliminate Juniper's discovery obligations to truthfully, completely, and accurately respond to Finjan's discovery requests. Further, none of the documents Juniper cited show *how* Joe Sandbox (i) stores the results of the dynamic analysis or (ii) uses a database with a clear schema. In fact, all but one of the documents were produced on November 6, 2018, buried among over 460,000 pages of documents produced that day. Finjan timely followed up in December 2018. The single document Juniper cites that was produced before November 2018 appears only to reference a publicly available database within a schedule of third-party licenses. Not only does this appear to be a different database, but there is no technical information whatsoever in the licensing information. Thus, Juniper cannot



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