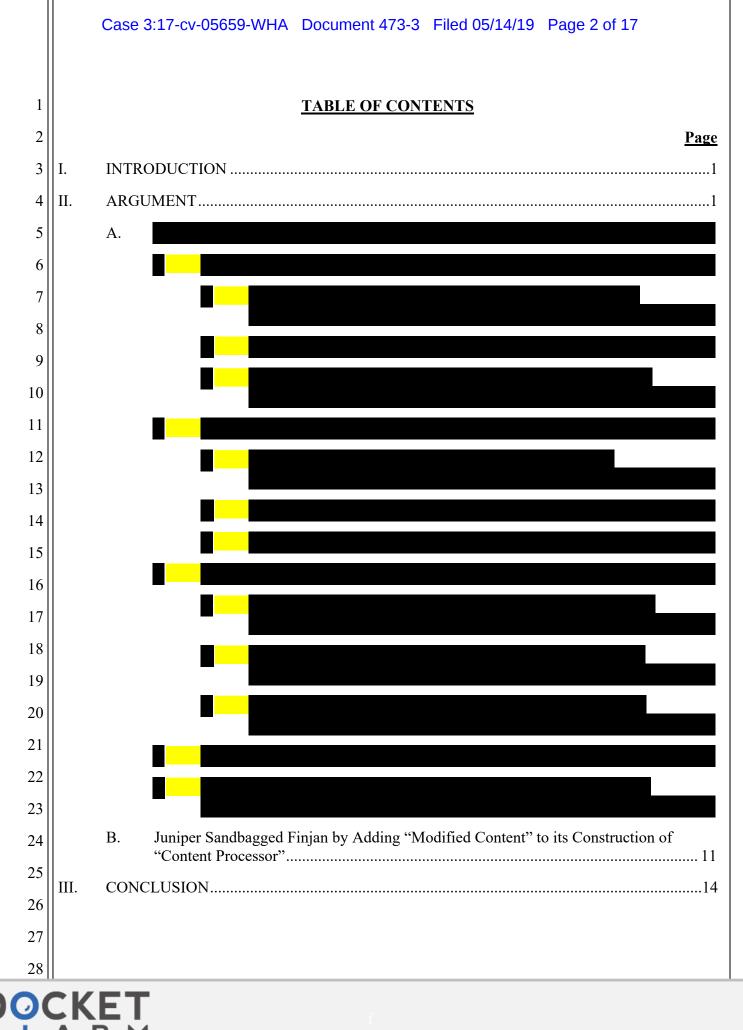
	Case 3:17-cv-05659-WHA	Document 473	-3 Filed 05/14/19	Page 1 of 17	
1 2 3 4 5 6 7 8 9 10	PAUL J. ANDRE (State Bar No. 1965 <u>pandre@kramerlevin.com</u> LISA KOBIALKA (State Bar No. 1917 <u>lkobialka@kramerlevin.com</u> JAMES HANNAH (State Bar No. 237 <u>jhannah@kramerlevin.com</u> KRISTOPHER KASTENS (State Bar <u>kkastens@kramerlevin.com</u> KRAMER LEVIN NAFTALIS & FRANKEL LLP 990 Marsh Road Menlo Park, CA 94025 Telephone: (650) 752-1700 Facsimile: (650) 752-1800 Attorneys for Plaintiff FINJAN, INC.	1404) 7978)			
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12					
13	IN THE UNITED STATES DISTRICT COURT				
14	FOR THE NORTHERN DISTRICT OF CALIFORNIA				
15					
16	SAN FRANCISCO DIVISION				
17	FINJAN, INC., a Delaware Corporation	on, Cas	se No.: 3:17-cv-0565	9-WHA	
18	Plaintiff,			INC.'S CORRECTED	
19	v.	RE	SPONSE TO ORD	ER TO SHOW CAUSE	
20	JUNIPER NETWORKS, INC., a Dela	ware	REDACTED VER UGHT TO BE SEA	SION OF DOCUMENT	
21	Corporation,		USHI IV DE SEA		
22	Defendant.				
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I. INTRODUCTION

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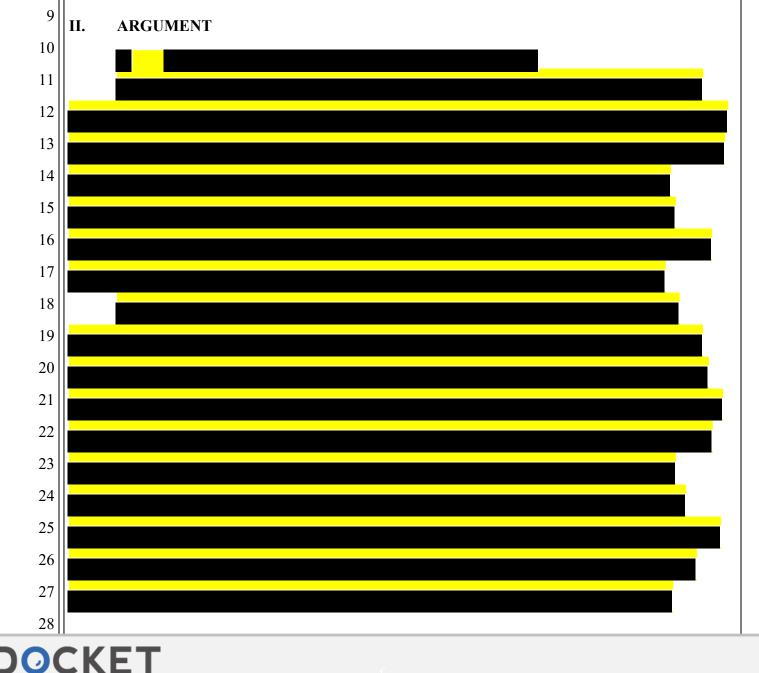
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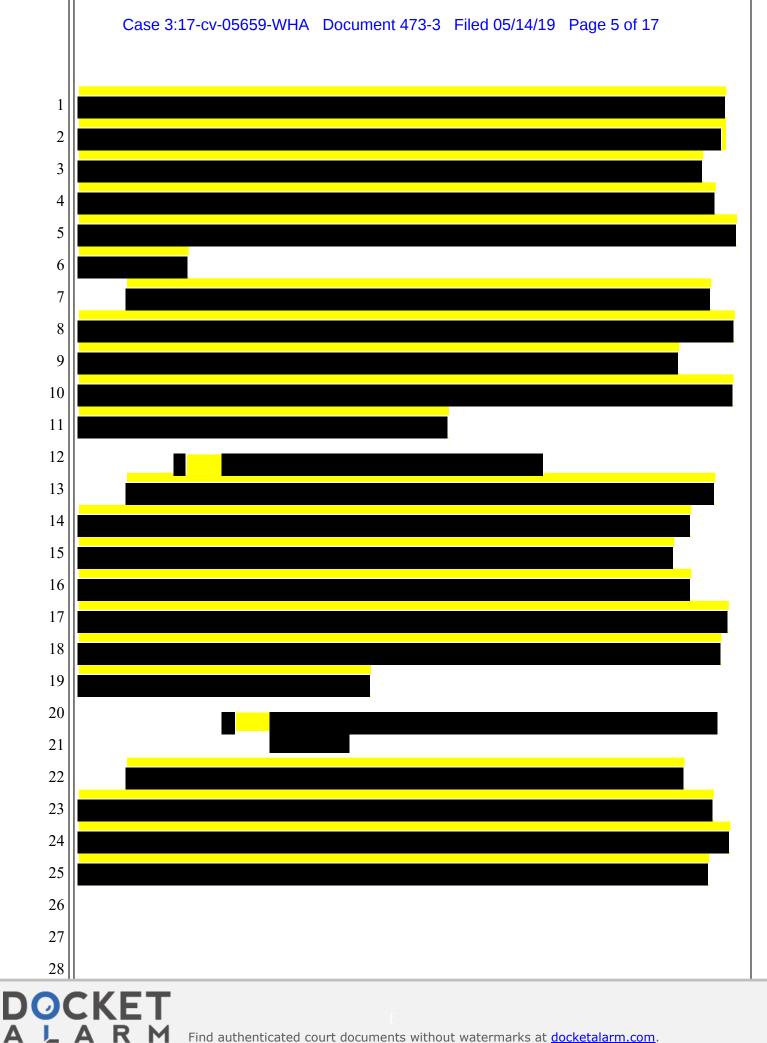
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8

Finjan, Inc. ("Finjan") has cause to present a case regarding Juniper Networks, Inc.'s ("Juniper") infringement of Claim 1 of U.S. Patent No. 8,141,154 (the "154 Patent") because: (1) Juniper's accused products infringe under the Court's new construction of "content processor"; and (2) a granting of summary judgment for nonmovant Juniper is procedurally improper because Juniper sandbagged Finjan by springing a new construction of "content processor" after Finjan had already submitted its summary judgment briefing and expert declaration. As such, Finjan has cause to present Claim 1 of the '154 Patent at trial because triable issues of fact remain.



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