

PAUL J. ANDRE (State Bar No. 196585)  
[pandre@kramerlevin.com](mailto:pandre@kramerlevin.com)  
LISA KOBIALKA (State Bar No. 191404)  
[lkobialka@kramerlevin.com](mailto:lkobialka@kramerlevin.com)  
JAMES HANNAH (State Bar No. 237978)  
[jhannah@kramerlevin.com](mailto:jhannah@kramerlevin.com)  
KRISTOPHER KASTENS (State Bar No. 254797)  
[kkastens@kramerlevin.com](mailto:kkastens@kramerlevin.com)  
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.

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

FINJAN, INC., a Delaware Corporation,

Plaintiff,

v.

JUNIPER NETWORKS, INC., a Delaware  
Corporation,

Defendant.

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

**PLAINTIFF FINJAN, INC.'S CORRECTED  
RESPONSE TO ORDER TO SHOW CAUSE**

**REDACTED VERSION OF DOCUMENT  
SOUGHT TO BE SEALED**

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**I. INTRODUCTION**

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.

**II. ARGUMENT**

[REDACTED]



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