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11 FINJAN, INC.

12
13 **IN THE UNITED STATES DISTRICT COURT**
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**
16

17 FINJAN, INC., a Delaware Corporation,

18 Plaintiff,

19 v.

20 JUNIPER NETWORKS, INC., a Delaware
21 Corporation,

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

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

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1 **I. INTRODUCTION**

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

9 **II. ARGUMENT**

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

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