

1 PAUL J. ANDRE (State Bar No. 196585)
2 pandre@kramerlevin.com
3 LISA KOBIALKA (State Bar No. 191404)
4 lkobialka@kramerlevin.com
5 JAMES HANNAH (State Bar No. 237978)
6 jhannah@kramerlevin.com
7 KRISTOPHER KASTENS (State Bar No. 254797)
8 kkastens@kramerlevin.com
9 KRAMER LEVIN NAFTALIS
10 & FRANKEL LLP
11 990 Marsh Road
12 Menlo Park, CA 94025
13 Telephone: (650) 752-1700
14 Facsimile: (650) 752-1800

15 Attorneys for Plaintiff
16 FINJAN, INC.

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

20 FINJAN, INC., a Delaware Corporation,

21 Plaintiff,

22 v.

23 JUNIPER NETWORKS, INC., a Delaware
24 Corporation,

25 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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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**

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