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12 *Attorneys for Defendant*
 13 JUNIPER NETWORKS, INC.

14
 15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**
 17 **SAN FRANCISCO DIVISION**

18	FINJAN, INC.,)	Case No. 3:17-cv-05659-WHA
19	Plaintiff,)	JUNIPER NETWORKS, INC.’S ANSWER
20	vs.)	TO FINJAN, INC.’S FIRST AMENDED
21	JUNIPER NETWORKS, INC.,)	COMPLAINT FOR PATENT
22	Defendant.)	INFRINGEMENT AND COUNTER-
23)	CLAIMS
24)	DEMAND FOR JURY TRIAL
25)	
26)	Action filed: September 29, 2017

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1 Defendant Juniper Networks, Inc. (“Juniper”) hereby submits this Answer to the First
2 Amended Complaint for Patent Infringement (Dkt. No. 88; the “FAC”) of plaintiff Finjan, Inc.
3 (“Finjan”) as follows. Except as expressly admitted herein, Juniper denies each and every
4 allegation contained in the FAC.

5 **THE PARTIES**

6 1. Juniper is without knowledge sufficient to form a belief as to the truth or falsity of
7 the allegations contained in paragraph 1 of the FAC, and therefore Juniper denies these
8 allegations.

9 2. Juniper admits that it is a corporation organized and existing under the laws of the
10 State of Delaware, having a place of business at 1133 Innovation Way, Sunnyvale, California
11 94089. Juniper admits that, for purposes of this action, Juniper may be served through its agent
12 for service of process, CT Corporation System, at 717 W. 7th Street, Suite 930, Los Angeles,
13 California 90017. To the extent paragraph 2 of the FAC may be construed as containing
14 additional allegations, Juniper denies such allegations.

15 **JURISDICTION AND VENUE**

16 3. Juniper admits that the FAC purports to set forth claims for patent infringement
17 under 35 U.S.C. § 101 *et seq.* Juniper further admits that jurisdiction is allegedly based on 28
18 U.S.C. §§ 1331 and 1338. Except as expressly admitted herein, Juniper denies each and every
19 allegation contained in paragraph 3 of the FAC.

20 4. Juniper admits, for purposes of this lawsuit only, that venue is proper in this
21 District.

22 5. Juniper admits that this Court has personal jurisdiction over Juniper. Juniper
23 admits that it regularly and continuously does business in this District. Except as expressly
24 admitted herein, Juniper denies each and every allegation contained in paragraph 5 of the FAC.

25 **INTRADISTRICT ASSIGNMENT**

26 6. Juniper admits that pursuant to Civil Local Rule 3-2(c), this action is properly
27 assigned on a district-wide basis because the FAC purports to allege claims for patent infringement.
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FINJAN’S [ALLEGED] INNOVATIONS

1
2 7. Juniper is without knowledge sufficient to form a belief as to the truth or falsity of
3 the allegations contained in paragraph 7 of the FAC, and therefore Juniper denies these
4 allegations.

5 8. Juniper is without knowledge sufficient to form a belief as to the truth or falsity of
6 the allegations contained in paragraph 8 of the FAC, and therefore Juniper denies these
7 allegations.

THE ASSERTED PATENTS

8
9 9. Juniper admits that a copy of what Finjan alleges to be United States Patent No.
10 6,154,844 (“the ‘844 Patent”) was attached to the FAC as Exhibit 1. Juniper admits that Exhibit 1
11 bears on its face the title “System And Method For Attaching A Downloadable Security Profile To
12 A Downloadable.” Juniper admits that Exhibit 1 states on its face that the alleged invention was
13 invented by Shlomo Touboul and Nachshon Gal. Juniper denies that the ‘844 Patent was duly or
14 legally issued. Except as expressly admitted herein, Juniper is without knowledge or information
15 sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 9 of
16 the FAC, and therefore Juniper denies these allegations.

17 10. Juniper is without knowledge or information sufficient to form a belief as to the
18 truth or falsity of the allegations contained in paragraph 10 of the FAC, and therefore Juniper
19 denies these allegations.

20 11. Juniper denies each and every allegation contained in paragraph 11 of the FAC.

21 12. Juniper admits that a copy of what Finjan alleges to be United States Patent No.
22 6,804,780 (“the ‘780 Patent”) was attached to the FAC as Exhibit 2. Juniper admits that Exhibit 2
23 bears on its face the title “System And Method For Protecting A Computer And A Network From
24 Hostile Downloadables.” Juniper admits that Exhibit 2 states on its face that the alleged invention
25 was invented by Shlomo Touboul. Juniper denies that the ‘780 Patent was duly or legally issued.
26 Except as expressly admitted herein, Juniper is without knowledge or information sufficient to
27 form a belief as to the truth or falsity of the allegations contained in paragraph 12 of the FAC, and
28 therefore Juniper denies these allegations.

1 13. Juniper is without knowledge or information sufficient to form a belief as to the
2 truth or falsity of the allegations contained in paragraph 13 of the FAC, and therefore Juniper
3 denies these allegations.

4 14. Juniper denies each and every allegation contained in paragraph 14 of the FAC.

5 15. Juniper admits that a copy of what Finjan alleges to be United States Patent No.
6 7,647,633 (“the ‘633 Patent”) was attached to the FAC as Exhibit 3. Juniper admits that Exhibit 3
7 bears on its face the title “Malicious Mobile Code Runtime Monitoring System And Methods.”
8 Juniper admits that Exhibit 3 states on its face that the alleged invention was invented by Yigal
9 Mordechai Edery, Nimrod Itzhak Vered, David R. Kroll, and Shlomo Touboul. Juniper denies
10 that the ‘633 Patent was duly or legally issued. Except as expressly admitted herein, Juniper is
11 without knowledge or information sufficient to form a belief as to the truth or falsity of the
12 allegations contained in paragraph 15 of the FAC, and therefore Juniper denies these allegations.

13 16. Juniper is without knowledge or information sufficient to form a belief as to the
14 truth or falsity of the allegations contained in paragraph 16 of the FAC, and therefore Juniper
15 denies these allegations.

16 17. Juniper denies each and every allegation contained in paragraph 17 of the FAC.

17 18. Juniper admits that a copy of what Finjan alleges to be United States Patent No.
18 7,613,926 (“the ‘926 Patent”) was attached to the FAC as Exhibit 4. Juniper admits that Exhibit 4
19 bears on its face the title “Method And System For Protecting A Computer And A Network From
20 Hostile Downloadables.” Juniper admits that Exhibit 4 states on its face that the alleged invention
21 was invented by Yigal Mordechai Edery, Nimrod Itzhak Vered, David R. Kroll, and Shlomo
22 Touboul. Juniper denies that the ‘926 Patent was duly or legally issued. Except as expressly
23 admitted herein, Juniper is without knowledge or information sufficient to form a belief as to the
24 truth or falsity of the allegations contained in paragraph 18 of the FAC, and therefore Juniper
25 denies these allegations.

26 19. Juniper is without knowledge or information sufficient to form a belief as to the
27 truth or falsity of the allegations contained in paragraph 19 of the FAC, and therefore Juniper
28 denies these allegations.

1 20. Juniper denies each and every allegation contained in paragraph 20 of the FAC.

2 21. Juniper admits that a copy of what Finjan alleges to be United States Patent No.
3 8,141,154 (“the ‘154 Patent”) was attached to the FAC as Exhibit 5. Juniper admits that Exhibit 5
4 bears on its face the title “System And Method For Inspecting Dynamically Generated Executable
5 Code.” Juniper admits that Exhibit 5 states on its face that the alleged invention was invented by
6 David Gruzman and Yuval Ben-Itzhak. Juniper denies that the ‘154 Patent was duly or legally
7 issued. Except as expressly admitted herein, Juniper is without knowledge or information
8 sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 21 of
9 the FAC, and therefore Juniper denies these allegations.

10 22. Juniper is without knowledge or information sufficient to form a belief as to the
11 truth or falsity of the allegations contained in paragraph 22 of the FAC, and therefore Juniper
12 denies these allegations.

13 23. Juniper denies each and every allegation contained in paragraph 23 of the FAC.

14 24. Juniper admits that a copy of what Finjan alleges to be United States Patent No.
15 8,677,494 (“the ‘494 Patent”) was attached to the FAC as Exhibit 6. Juniper admits that Exhibit 6
16 bears on its face the title “Malicious Mobile Code Runtime Monitoring System And Methods.”
17 Juniper admits that Exhibit 6 states on its face that the alleged invention was invented by Yigal
18 Mordechai Edery, Nirmrod [*sic*] Itzhak Vered, David R. Kroll, and Shlomo Touboul. Juniper
19 denies that the ‘494 Patent was duly or legally issued. Except as expressly admitted herein,
20 Juniper is without knowledge or information sufficient to form a belief as to the truth or falsity of
21 the allegations contained in paragraph 24 of the FAC, and therefore Juniper denies these
22 allegations.

23 25. Juniper is without knowledge or information sufficient to form a belief as to the
24 truth or falsity of the allegations contained in paragraph 25 of the FAC, and therefore Juniper
25 denies these allegations.

26 26. Juniper denies each and every allegation contained in paragraph 26 of the FAC.

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