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15	UNITED STATES DISTRICT COURT				
16	NORTHERN DISTRICT OF CALIFORNIA				
17	SAN FRANCIS	SCO DIVISION			
18	FINJAN, INC., a Delaware Corporation,	Case No. 3:17-cv-05659-WHA			
19	Plaintiff,	DEFENDANT JUNIPER NETWORKS, INC.'S MOTION FOR SUMMARY			
20	VS.	JUDGMENT REGARDING CLAIM 1 OF U.S. PATENT NO. 6,804,780			
21	JUNIPER NETWORKS, INC., a Delaware Corporation,)			
22	Defendant.				
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NOTICE OF MOTION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

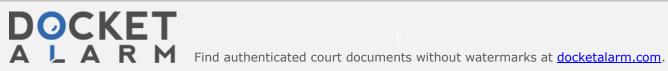
PLEASE TAKE NOTICE that on July 26, 2018, at 8:00 a.m., or as soon thereafter as the matter may be heard, in Courtroom 12, 19th Floor, of the San Francisco Courthouse, 450 Golden Gate Avenue, San Francisco, California 94102, before the Honorable William Alsup, Defendant Juniper Networks, Inc. ("Juniper") will and hereby does move for an order finding that claim 1 of U.S. Patent No. 6,804,780 ("the '780 Patent") is unpatentable under 35 U.S.C. § 101, that Juniper does not infringe claim 1 of the '780 Patent, and that any damages available to plaintiff Finjan, Inc. ("Finjan") are limited to those accrued based on acts of infringement occurring after September 29, 2017. This motion is based on: this Notice of Motion; the memorandum of points and authorities below; the Declaration of Rebecca Carson and Exhibits 1 through 16 attached hereto; the Declaration of Dr. Aviel D. Rubin attached hereto; the Declaration of Yuly Nerida Becerra Tenorio attached hereto; all documents in the Court's file; and such other written or oral argument as may be presented at or before the time this motion is heard by the Court.

STATEMENT OF RELIEF REQUESTED

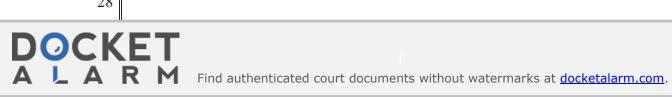
Juniper seeks an order holding that claim 1 of the '780 Patent is invalid as directed to unpatentable subject matter under 35 U.S.C. § 101, that Juniper does not infringe claim 1 of the '780 Patent based on any alleged use of SRX Series Services Gateway ("SRX") products or the Sky Advanced Threat Prevention ("Sky ATP") service (individually or in combination), and that damages for any potential infringement by Juniper of claim 1 of the '780 Patent are limited under 35 U.S.C. § 287 to those accrued based on acts of infringement occurring after September 29, 2017 (the filing of the complaint in this matter) and before November 6, 2017 (the expiration date of the '780 Patent).



1	STATEMENT OF ISSUES TO BE DECIDED ¹		
2	1. Wh	nether Juniper is entitled to summary judgment that claim 1 of the '780 Patent is	
3	directed to unpater	ntable subject matter under 35 U.S.C. § 101.	
4	2. Wh	nether Juniper is entitled to summary judgment that Juniper does not infringe	
5	claim 1 of the '780	Patent with respect to the SRX products.	
6	3. Wh	nether Juniper is entitled to summary judgment that Juniper does not infringe	
7	claim 1 of the '780	Patent with respect to the cloud-based Sky ATP service.	
8	4. Wh	nether Juniper is entitled to summary judgment that Juniper does not infringe	
9	claim 1 of the '780	Patent with respect to the combination of the SRX products with the cloud-	
10	based Sky ATP service.		
11	5. Wh	nether the damages for any potential infringement by Juniper of claim 1 of the	
12	'780 Patent are limited under 35 U.S.C. § 287 to those accrued based on acts of infringement		
13	occurring after September 29, 2017 (the filing of the complaint in this matter) and before		
14	November 6, 2017	7 (the expiration date of the '780 Patent).	
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26	fundamental differ	780 Patent is also invalid under 35 U.S.C. §§ 102, 103. Moreover, the rences between Juniper's SRX and Sky ATP products and the '780 Patent provide	
27	there is a trial on c	gement arguments in addition to those specifically addressed in this Motion. If claim 1, Juniper may make other invalidity and non-infringement arguments, not	
28		ssed in this Motion. It may also raise one or more affirmative defenses not ally in this Motion.	



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