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Attorneys for Defendants  
 CHECK POINT SOFTWARE  
 TECHNOLOGIES, INC. and CHECK POINT  
 SOFTWARE TECHNOLOGIES, LTD.

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

21 FINJAN, INC., a Delaware Corporation  
 22  
 23 Plaintiff,  
 24  
 25 v.  
 26 CHECK POINT SOFTWARE  
 27 TECHNOLOGIES, INC., a Delaware  
 Corporation and CHECK POINT SOFTWARE  
 TECHNOLOGIES, LTD., an Israeli Limited  
 Company  
 28 Defendants.

Case No. 3:18-cv-02621-WHO (JCS)  
**JOINT MOTION, STIPULATION AND  
 ORDER EXTENDING  
 CASE DEADLINES**

1 Pursuant to Local Rules 6-1(b), 6-2 and 7-12, Plaintiff Finjan, Inc. (“Finjan”) and  
2 Defendants Check Point Software Technologies, Inc. and Check Point Technologies, Ltd.  
3 (collectively, “Check Point”) jointly request the Court to modify the case schedule as set forth in  
4 this stipulation.

5 WHEREAS, on January 17, 2020, the Court issued an Order regarding Check Point’s  
6 Motion to Strike Finjan’s Infringement Contentions (Dkt. No. 247) and a Notice of Intent to  
7 Appoint Master Under Rule 53 to resolve certain disputes regarding Finjan’s Infringement  
8 Contentions (Dkt. No. 248).

9 WHEREAS, Finjan and Check Point have agreed that the scope of the case may be  
10 impacted based on the pending resolution of disputes before the special master. As a result, Finjan  
11 and Check Point have agreed to extend certain claim construction deadlines. The proposed  
12 extensions below, will not have a material effect on the remainder of this case.

13 WHEREAS, the Court previously modified the schedule in this case eleven (11) times: (i)  
14 to adjust the briefing schedule for Finjan’s Motion to Impute Service, Dkt. No. 35; (ii) to extend  
15 the hearing date on Finjan’s Motion to Impute Service by seven days, Dkt. No. 42; (iii) to adjust  
16 the briefing schedule and hearing on Finjan’s Motion to Strike and extend Check Point’s time to  
17 respond to the complaint, Dkt. No. 52; (iv) to extend Check Point’s time to file a Reply in support  
18 of its Motion to Enforce Order and Strike Infringement Contentions, Dkt. No. 64; (v) to extend  
19 Finjan’s time to respond to Check Point’s affirmative defenses, Dkt. No. 82; (vi) to grant Check  
20 Point’s motion to modify the claim construction schedule, Dkt. No. 84; (vii) to grant Check Point’s  
21 motion to continue to change the claim construction schedule, Dkt. No. 108; (viii) to grant the  
22 parties’ stipulation for Finjan to file its opposition to Check Point’s Motion to Amend Invalidity  
23 Contentions, Dkt. No. 149; (ix) to grant the parties’ stipulation to change the parties’ briefing  
24 schedule related to Check Point’s Motion to Strike Infringement Contentions, Dkt. No. 227; (x) to  
25 grant the parties’ stipulation to an extended case schedule following the Court’s mandated meet-  
26 and-confer, Dkt. Nos. 236, 238; and (xi) to grant the parties’ stipulation to extend certain claim  
27 construction deadlines, Dkt. No. 246.  
28

1 NOW, THEREFORE, the parties hereby stipulate and request the Court to modify case  
 2 schedule as follows:

Item	Original Dates	Stipulated Dates
Exchange Proposed Terms for Construction	1/24/2020 (Dkt. No. 246)	2/7/2020
Exchange of Preliminary Claim Constructions	1/31/2020 (Dkt. No. 246)	2/14/2020
Joint Claim Construction & Prehearing Statement	2/7/2020 (Dkt. No. 246)	2/21/2020
Completion of Claim Construction Discovery	2/14/2020 (Dkt. No. 246)	2/28/2020
Plaintiff's Opening Claim Construction Brief	2/17/2020 (Dkt. No. 238)	3/2/2020
Defendant's Responsive Claim Construction Brief	3/2/2020 (Dkt. No. 238)	3/16/2020
Plaintiff's Reply Claim Construction Brief	3/9/2020 (Dkt. No. 239)	3/23/2020
Claim Construction Hearing	Tutorial: 3/30/2020 (10 a.m.) Hearing: 4/3/2020 (10 a.m.) (Dkt No. 238)	No change

1 **IT IS SO STIPULATED.**

2 Respectfully submitted,

3 Dated: January 24, 2020

4 By: /s/ Kristopher Kastens  
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6 Lisa Kobialka (SBN 191404)  
7 James Hannah (SBN 237978)  
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20 FINJAN, INC.

21 Respectfully submitted,

22 Dated: January 24, 2020

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**ATTESTATION**

I, Kristopher Kastens, am the ECF user whose identification and password are being used in this filing. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all other signatories to this document have concurred in the filing of this document.

        /s/ Kristopher Kastens          
Kristopher Kastens

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