

# EXHIBIT B

1 PAUL 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.,

21 Plaintiff,

22 v.

23 QUALYS, INC.,

24 Defendant.

Case No.: 4:18-cv-07229-YGR

**PLAINTIFF FINJAN, INC.’S INITIAL  
 DISCLOSURE OF ASSERTED CLAIMS  
 AND INFRINGEMENT CONTENTIONS  
 AND DOCUMENT PRODUCTION  
 PURSUANT TO PATENT LOCAL RULES  
 3-1 AND 3-2**

1 Pursuant to Patent Local Rules 3-1 and 3-2 of the United States District Court for the Northern  
2 District of California, Plaintiff Finjan, Inc. (“Finjan”) makes the following Initial Disclosure of  
3 Asserted Claims and Infringement Contentions and Document Production Accompanying Disclosure,  
4 including the attached claim charts (the “Disclosure”) to Qualys, Inc. (hereinafter “Qualys” or  
5 “Defendant”).

6 Finjan makes this Disclosure based upon information presently known and reasonably available  
7 to it as of this date, as Finjan’s investigations are ongoing and Defendant has yet to provide any  
8 discovery. Accordingly, Finjan reserves the right to amend, modify, supplement, or narrow any  
9 portion of this Disclosure, including, but not limited to, the identification of the claims infringed by  
10 Defendant, the products and services accused of infringement and the bases and manner of  
11 infringement described in this Disclosure. Finjan reserves the right to supplement this Disclosure as  
12 necessary and as appropriate in accordance with the Federal Rules of Civil Procedure and this Court’s  
13 Local Rules, including Patent Local Rule 3-6, in light of future document production, interrogatory  
14 responses, admissions, disclosures, contentions, fact witness testimony, expert discovery, any other  
15 discovery, future rulings from the Court (including claim construction), any amendments to the  
16 pleadings, any additional items of evidence, or for any other reason authorized by statute, rule, or  
17 applicable case law. Finjan further reserves the right to rely upon the opinions of one or more experts  
18 in support of its infringement contentions in accordance with the Court’s scheduling order.

19 **I. PATENT L.R. 3-1: DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT**  
20 **CONTENTIONS.**

21 **A. Identification Of Asserted Claims And Applicable Subsections Of 35 U.S.C. § 271.**

22 Finjan provides the following contentions pursuant to Patent Local Rule 3-1(a):

23 Defendant directly infringed pursuant to 35 U.S.C. § 271(a) claims 1-9, 11, 15-17, 21-23, 32,  
24 and 41-44 of U.S. Pat. No. 6,154,844 (“the ‘844 Patent”), claims 1, 6-7, 9-11, 13-15, 23, 26, and 32-33  
25 of U.S. Patent No. 6,965,968 (“the ‘968 Patent”), claims 1, 2, 14, 15, and 17 of U.S. Patent No.  
26 7,418,731 (“the ‘731 Patent”), claims 1-2, 5-14, and 17-25 of U.S. Patent No. 7,975,305 (“the ‘305  
27 Patent”), claims 1-2, and 4 of U.S. Patent No. 8,141,154 (“the ‘154 Patent”), claims 1, 3-8, 22-23, 29,

1 and 35 of U.S. Patent No. 8,225,408 (“the ‘408 Patent”); and claims 10-16, and 18 of U.S. Patent No.  
2 8,677,494 (“the ‘494 Patent”), collectively (the “Asserted Claims”).

3 Finjan reserves the right to amend, modify, supplement, or narrow these contentions, as  
4 appropriate, pursuant to Patent Local Rule 3-6, including identifying additional asserted claims, as it  
5 obtains additional information over the course of discovery and in light of the Court’s claim  
6 construction order.

7 **B. Identification Of Accused Instrumentalities.**

8 Finjan provides the following contentions pursuant to Patent Local Rule 3-1(b):

9 Finjan accuses the following of Defendant’s products and services, and associated software and  
10 subscriptions, of infringing claims 1-9, 11, 15-17, 21-23, 32, and 41-44 of the ‘844 Patent: Malware  
11 Detection (MD, MDS, Malware Detection services), Web Application Scanning (WAS), Web  
12 Application Firewall (WAF), Secure Seal, Vulnerability Management (VM), Continuous Monitoring  
13 (CM), ThreatPROTECT (TP), Cloud Agent (CA) technology, the Knowledgebase, the Qualys research  
14 labs, and Qualys Scanner Appliance and Virtual Appliance, identified in the attached Appendix A  
15 (“Accused Instrumentalities of the ‘844 Patent”) whether sold a la carte or as part of a bundled  
16 package, including but not limited to the Qualys Cloud Suite (Enterprise, Express, Express Lite), the  
17 Qualys Cloud Platform (Enterprise, Mid-sized business, or Small business), and the Qualys Cloud  
18 Platform for Consultants.

19 Finjan accuses the following of Defendant’s products and services, and associated software and  
20 subscriptions, of infringing claims 1, 6-7, 9-11, 13-15, 23, 26, and 32-33 of the ‘968 Patent: Malware  
21 Detection (MD, MDS, Malware Detection Services), Web Application Scanning (WAS), Web  
22 Application Firewall (WAF), Secure Seal, Vulnerability Management (VM), Continuous Monitoring  
23 (CM), ThreatPROTECT (TP), Indication of Compromise (IOC), Policy Compliance (PC), Cloud  
24 Agent (CA) technology, the Knowledgebase, Qualys research labs, and Qualys Scanner Appliance and  
25 Virtual Appliance, identified in the attached Appendix B (“Accused Instrumentalities of the ‘968  
26 Patent”) whether sold a la carte or as part of a bundled package, including but not limited to the Qualys  
27  
28

1 Cloud Suite (Enterprise, Express, Express Lite), the Qualys Cloud Platform (Enterprise, Mid-sized  
2 business, or Small business), and the Qualys Cloud Platform for Consultants.

3 Finjan accuses the following of Defendant's products and services, and associated software and  
4 subscriptions, of infringing claims 1, 2, 14, 15, and 17 of the '731 Patent: Malware Detection (MD,  
5 MDS, Malware Detection Services), Web Application Scanning (WAS), Web Application Firewall  
6 (WAF), Secure Seal, Vulnerability Management (VM), Continuous Monitoring (CM),  
7 ThreatPROTECT (TP), Indication of Compromise (IOC), Policy Compliance (PC), Cloud Agent (CA)  
8 technology, the Knowledgebase, Qualys research labs, and Qualys Scanner Appliance and Virtual  
9 Appliance, identified in the attached Appendix C ("Accused Instrumentalities of the '731 Patent"),  
10 whether sold a la carte or as part of a bundled package, including but not limited to the Qualys Cloud  
11 Suite (Enterprise, Express, Express Lite), the Qualys Cloud Platform (Enterprise, Mid-sized business,  
12 or Small business), and the Qualys Cloud Platform for Consultants.

13 Finjan accuses the following of Defendant's products and services, and associated software and  
14 subscriptions, of infringing claims 1-2, 5-14, and 17-25 of the '305 Patent: Malware Detection (MD,  
15 MDS, Malware Detection Services), Web Application Scanning (WAS), Web Application Firewall  
16 (WAF), Secure Seal, Vulnerability Management (VM), Continuous Monitoring (CM),  
17 ThreatPROTECT (TP), Indication of Compromise (IOC), Policy Compliance (PC), Cloud Agent (CA)  
18 technology, the Knowledgebase, Qualys research labs, and Qualys Scanner Appliance and Virtual  
19 Appliance, identified in the attached Appendix D ("Accused Instrumentalities of the '305 Patent"),  
20 whether sold a la carte or as part of a bundled package, including but not limited to the Qualys Cloud  
21 Suite (Enterprise, Express, Express Lite), the Qualys Cloud Platform (Enterprise, Mid-sized business,  
22 or Small business), and the Qualys Cloud Platform for Consultants.

23 Finjan accuses the following of Defendant's products and services of infringing claims 1-2, and  
24 4 of the '154 Patent: Malware Detection (MD, MDS, Malware Detection Services), Web Application  
25 Scanning (WAS), Web Application Firewall (WAF), Secure Seal, Vulnerability Management (VM),  
26 Continuous Monitoring (CM), ThreatPROTECT (TP), Indication of Compromise (IOC), Policy  
27 Compliance (PC), Compliance Monitoring, Container Security, Cloud Agent (CA) technology, the

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