

EXHIBIT F

1 EDWARD G. POPLAWSKI (SBN 113590)
epoplawski@wsgr.com
2 OLIVIA M. KIM (SBN 228382)
okim@wsgr.com
3 WILSON SONSINI GOODRICH & ROSATI
4 Professional Corporation
633 West Fifth Street, Suite 1550
5 Los Angeles, CA 90071
Telephone: (323) 210-2901
6 Facsimile: (866) 974-7329

7 RYAN R. SMITH (SBN 229323)
rsmith@wsgr.com
8 CHRISTOPHER D. MAYS (SBN 266510)
cmays@wsgr.com
9 WILSON SONSINI GOODRICH & ROSATI
10 Professional Corporation
650 Page Mill Road
11 Palo Alto, CA 94304-1050
12 Telephone: (650) 493-9300
Facsimile: (650) 493-6811

13 *Attorneys for Defendant*
14 QUALYS INC.

15 **IN THE UNITED STATES DISTRICT COURT**
16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
17 **OAKLAND DIVISION**

19 FINJAN, INC., a Delaware Corporation,) CASE NO.: 4:18-cv-07229-YGR
20)
21 Plaintiff,) **DEFENDANT QUALYS INC.'S**
22) **PRELIMINARY DISCLOSURE OF**
23 v.) **INTRINSIC AND EXTRINSIC**
24) **EVIDENCE**
25 QUALYS INC., a Delaware Corporation,) **DEMAND FOR JURY TRIAL**
26)
27)
28)

1 Pursuant to Patent Local Rule 4-2, the Court’s Scheduling Order, and the parties’
2 agreements, Defendant Qualys Inc. (“Qualys”) provides its preliminary disclosure of intrinsic
3 and extrinsic evidence attached here as **Exhibit 1**. Qualys notes that discovery is ongoing,
4 including discovery regarding claim construction, and Qualys therefore reserves the right to
5 supplement or amend these disclosures. Qualys further reserves the right to revise these
6 disclosures based on evidence identified by Finjan, including to use any evidence identified by
7 Finjan (in this or any previous matter). For example, Qualys may rely upon the expert testimony
8 of Dr. Aviel Rubin in connection with any or all the claim constructions proposed below.

9
10 Respectfully submitted,

11
12 DATED: November 6, 2019

By: /s/ Christopher D. Mays

EDWARD G. POPLAWSKI (SBN 113590)

epoplawski@wsgr.com

OLIVIA M. KIM (SBN 228382)

okim@wsgr.com

WILSON SONSINI GOODRICH & ROSATI

Professional Corporation

633 West Fifth Street, Suite 1550

Los Angeles, CA 90071

Telephone: (323) 210-2901

Facsimile: (866) 974-7329

RYAN R. SMITH (SBN 229323)

rsmith@wsgr.com

CHRISTOPHER D. MAYS (SBN 266510)

cmays@wsgr.com

WILSON SONSINI GOODRICH & ROSATI

Professional Corporation

650 Page Mill Road

Palo Alto, CA 94304-1050

Telephone: (650) 493-9300

Facsimile: (650) 493-6811

Counsel for Defendant

QUALYS INC.

EXHIBIT 1: QUALYS’S PATENT LR 4-2 DISCLOSURES

Pat.	Term	Def. Proposal	Evidence
844	“means for comparing the first downloadable security profile against the security policy if the first downloadable security profile is trustworthy”	<p>This term is subject to 35 USC Section 112 Paragraph 6.</p> <p>Function: comparing the first downloadable security profile against the security policy if the first downloadable security profile is trustworthy;</p> <p>Structure: local security policy analysis engine 530</p>	<p>‘844 Patent at Abstract; Claim 44; Figs. 1-8; 2:20-60; 3:33-48; 8:6-8; 8:17-36; 9:23-29; 10:2-5; 10:66-11:11.</p> <p><i>Finjan, Inc. v. Blue Coat Sys., Inc.</i>, Civ. No. 5:13-cv-0399 (N.D. Cal. Oct. 20, 2014) (claim construction order).</p> <p><i>Finjan, Inc. v. Blue Coat Sys., Inc.</i>, Civ. No. 5:13-cv-0399 (N.D. Cal. June 16, 2014) (Finjan’s opening claim construction order).</p> <p><i>Finjan, Inc. v. Blue Coat Sys., Inc.</i>, Civ. No. 5:13-cv-0399 (N.D. Cal. June 30, 2014) (Blue Coat’s responsive claim construction order).</p> <p><i>Finjan, Inc. v. Blue Coat Sys., Inc.</i>, Civ. No. 5:13-cv-0399 (N.D. Cal. June 30, 2014) (Declaration of Dr. Peter Reiher).</p> <p><i>Finjan, Inc. v. Blue Coat Sys., Inc.</i>, Civ. No. 5:13-cv-0399 (N.D. Cal. June 30, 2014) (May 23, 2014 Deposition of Dr. Peter Reiher).</p> <p><i>Finjan, Inc. v. Blue Coat Sys., Inc.</i>, Civ. No. 5:13-cv-0399 (N.D. Cal. July 4, 2014) (Finjan’s reply claim construction order).</p>
844	“means for determining whether to trust the first Downloadable security profile”	<p>This term is subject to 35 USC Section 112 Paragraph 6.</p> <p>Function: determining whether to trust the first downloadable security profile</p> <p>Structure: certificate authenticator 515 and downloadable ID verification engine 520</p>	<p>‘844 Patent at Abstract; Claim 44; Figs. 1-8; 2:20-60; 3:33-67; 8:17-36; 9:23-29; 10:66-11:11.</p> <p><i>Finjan, Inc. v. Blue Coat Sys., Inc.</i>, Civ. No. 5:13-cv-0399 (N.D. Cal. Oct. 20, 2014) (claim construction order).</p> <p><i>Finjan, Inc. v. Blue Coat Sys., Inc.</i>, Civ. No. 5:13-cv-0399 (N.D. Cal. June 16, 2014) (Finjan’s opening claim construction order).</p> <p><i>Finjan, Inc. v. Blue Coat Sys., Inc.</i>, Civ. No. 5:13-cv-0399 (N.D. Cal. June 30, 2014) (Blue Coat’s responsive claim construction order).</p>

			<p><i>Finjan, Inc. v. Blue Coat Sys., Inc.</i>, Civ. No. 5:13-cv-0399 (N.D. Cal. June 30, 2014) (Declaration of Dr. Peter Reiher)</p> <p><i>Finjan, Inc. v. Blue Coat Sys., Inc.</i>, Civ. No. 5:13-cv-0399 (N.D. Cal. June 30, 2014) (May 23, 2014 Deposition of Dr. Peter Reiher)</p> <p><i>Finjan, Inc. v. Blue Coat Sys., Inc.</i>, Civ. No. 5:13-cv-0399 (N.D. Cal. July 4, 2014) (Finjan’s reply claim construction brief).</p>
844	“security context”	an environment in which a software application is run, which may limit resources that the application is permitted to access or operations that the application is permitted to perform	<p><i>Finjan, Inc. v. Proofpoint, Inc.</i>, Civ. No. 4:13-cv-5808-HS (N.D. Cal. Dec. 3, 2015) (claim construction order).</p> <p><i>Finjan, Inc. v. Proofpoint, Inc.</i>, Civ. No. 4:13-cv-5808-HS (N.D. Cal. Jan. 26, 2015) (joint claim construction and pre-hearing brief).</p>
844	“web client”	an application on the computer of an end-user that requests a downloadable from the web server	<p>‘844 Patent: Claims 1, 15, 22, 23, 32, 41, 42, 43, 44; 2:3-15; 5:14-19; 5:28-33; 6:2-17; 7:6-8:4; 8:17-36; 8:49-51; 8:65-66; 9:63-10:13; Figs. 1 and 7.</p> <p><i>Finjan, Inc. v. Symantec Corp.</i>, Civ. No. 4:14-cv-02998-HS (N.D. Cal. Feb. 10, 2017) (claim construction order).</p> <p><i>Finjan, Inc. v. Symantec Corp.</i>, Civ. No. 4:14-cv-02998-HS (N.D. Cal. Dec. 20, 2017) (Finjan’s reply to Symantec’s supplemental claim construction brief).</p> <p><i>Finjan, Inc. v. Symantec Corp.</i>, Civ. No. 4:14-cv-02998-HS (N.D. Cal. Dec. 13, 2017) (Symantec’s responsive supplemental claim construction brief).</p> <p><i>Finjan, Inc. v. Symantec Corp.</i>, Civ. No. 4:14-cv-02998-HS (N.D. Cal. Nov. 29, 2017) (Finjan’s supplemental claim construction brief).</p>

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