

Juanita R. Brooks (CA SBN 75934)
brooks@fr.com
Jason W. Wolff (CA SBN 215819)
wolff@fr.com
Megan A. Chacon (CA SBN 304912)
chacon@fr.com
FISH & RICHARDSON P.C.
12860 El Camino Real, Suite 400
San Diego, CA 92130
Telephone: (858) 678-5070 / Fax: (858) 678-5099

Robert P. Courtney (CA SBN 248392)
courtney@fr.com
FISH & RICHARDSON P.C.
3200 RBC Plaza
60 South 6th Street
Minneapolis, MN 55402
Telephone: (612) 335-5070 / Fax: (612) 288-9696

Proshanto Mukherji (Admitted *pro hac vice*)
mukherji@fr.com
FISH & RICHARDSON P.C.
One Marina Park Drive
Boston, MA 02210
Telephone: (617) 542-5070 / Fax (617) 542-8906

Attorneys for Plaintiff
FINJAN LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(OAKLAND DIVISION)

FINJAN LLC, a Delaware Limited Liability
Company,

Plaintiff,

v.

QUALYS INC., a Delaware Corporation,

Defendant.

Case No. 4:18-cv-07229-YGR (TSH)

**PLAINTIFF FINJAN LLC'S OBJECTION
TO DEFENDANT QUALYS INC.'S
REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF ITS MOTION FOR
JUDGMENT ON THE PLEADINGS**

1 Plaintiff Finjan LLC (“Finjan”) hereby objects to Defendant Qualys Inc.’s (“Qualys”)
2 request pursuant to Federal Rule of Evidence 201 that the Court take judicial notice of the
3 documents identified as Exhibits A-E, as well as Dkt. No. 100-11, in Qualys’s request. (Dkt. No.
4 125.) The subject documents are being selectively cited out of context and in a manner not
5 consistent with a motion under Federal Rule of Civil Procedure 12(c). *See Khoja v. Orexigen*
6 *Therapeutics, Inc.*, 899 F.3d 988, 998 (9th Cir. 2018). Finjan incorporates by reference its
7 objection to Qualys’s request for judicial notice of these documents as articulated in Plaintiff
8 Finjan LLC’s Opposition to Defendant Qualys Inc.’s Motion for Judgment on the Pleadings. *See*
9 Dkt. No. 131. For the reasons stated therein, Finjan respectfully requests the Court decline to take
10 judicial notice of Exhibits A-E, as well as Dkt. No. 100-11, in Qualys’s request.

11
12 Dated: November 5, 2020

/s/ Megan A. Chacon

Juanita R. Brooks (CA SBN 75934)

brooks@fr.com

Jason W. Wolff (CA SBN 215819)

wolff@fr.com

Megan A. Chacon (CA SBN 304912)

chacon@fr.com

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12860 El Camino Real, Suite 400

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Telephone: (858) 678-5070

Facsimile: (858) 678-5099

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3200 RBC Plaza

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Attorneys for Plaintiff
FINJAN LLC.

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that a true and correct copy of the above and foregoing
3 document has been served on November 5, 2020, to all counsel of record who are deemed to have
4 consented to electronic service via the Court's CM/ECF system. Any other counsel of record will
5 be served by electronic mail and regular mail.

6
7 /s/ Megan A. Chacon
8 Megan A. Chacon (CA SBN 304912)
9 chacon@fr.com

10 *Attorney for Plaintiff*
11 FINJAN LLC.
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