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9 *Attorneys for Defendant*  
10 QUALYS INC.

11 **IN THE UNITED STATES DISTRICT COURT**  
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
13 **OAKLAND DIVISION**

15 FINJAN LLC ) CASE NO.: 4:18-cv-07229-YGR (TSH)  
16 )  
16 Plaintiff, )  
17 )  
17 v. ) **DEFENDANT QUALYS INC.’S**  
18 ) **NOTICE OF CROSS-MOTION AND**  
18 ) **CROSS-MOTION FOR SUMMARY**  
19 QUALYS INC., ) **JUDGMENT AND OPPOSITION TO**  
19 ) **PLAINTIFF FINJAN LLC’S MOTION**  
20 Defendant. ) **FOR SUMMARY JUDGMENT**  
20 )  
21 ) **Judge: Hon. Yvonne Gonzalez**  
21 ) **Rogers**  
22 )  
22 ) **Date: July 6, 2021**  
23 ) **Time: 2:00 P.M.**  
23 ) **Location: Courtroom 1, 4th Floor<sup>1</sup>**

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28 <sup>1</sup> Per the Court’s Notice regarding Civil Law and Motion Calendars and its Order at D.I. 48, hearings are via Zoom videoconference

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26  
27  
28

**TABLE OF CONTENTS**

**PAGE**

I. INTRODUCTION..... 1

II. PARTIAL SUMMARY JUDGMENT OF NONINFRINGEMENT .....2

    A. Factual Background.....2

    B. The Accused Qualys Scanner Products Do Not Infringe the '408 Patent.....3

        1. The Same Computer Does Not Perform Each Claimed Step.....3

        2. Qualys Does Not Indicate “potential *exploits*” .....6

            a. The '408 Patent Covers Behavioral Analysis, Not Signature-Based Analysis .....7

            b. Qualys’s Products Perform Only Signature-Based Analysis That Is Not Covered By the '408 Patent. ....9

        3. Qualys Does Not Perform “Dynamically Building” *While* “Receiving The Incoming Stream” ..... 10

    C. Qualys Does Not Infringe the '844 and '494 Patents..... 13

III. PARTIAL SUMMARY JUDGMENT OF NO DAMAGES ..... 16

    A. Required Notice of Infringement for Patent Damages..... 16

    B. Finjan Cannot Recover Damages Because It Failed to Provide Sufficient Notice Prior to Patent Expiration ..... 17

IV. OPPOSITION TO FINJAN’S MOTION FOR SUMMARY JUDGMENT..... 19

    A. DSAVT is Admissible Prior Art. .... 19

        1. Qualys Will Show at Trial That DSAVT Is Authentic and Admissible..... 19

        2. Finjan Is Not Entitled to S.J. About Whether DSAVT Is Prior Art.....21

    B. Mounji and Thomson Are Admissible Prior Art.....23

        1. Authenticity of Mounji and Thomson .....23

        2. Public Accessibility of Mounji.....24

        3. Public Accessibility of Thomson .....25

V. CONCLUSION .....25



**STATUTES & RULES**

1		
2	35 U.S.C. § 102 .....	21
3	35 U.S.C. § 287 .....	16, 17
4	Fed. R. Evid. 901 .....	19, 20, 23, 24
5	Fed. R. Evid. 803 .....	20, 24

**TABLE OF ABBREVIATIONS**

8	Finjan	Plaintiff Finjan LLC (f/k/a Finjan Inc.)
9	Qualys	Defendant Qualys, Inc.
10	Fact	Fact identified in Qualys's Statement of Undisputed Material Facts in Support of Cross-Motion, filed concurrently herewith
11	A.F.	Additional Fact identified in Qualys's Responsive Separate Statement of Undisputed Material Facts, filed concurrently herewith
12		
13	Mays Decl.	Declaration of Christopher Mays, filed concurrently herewith
14	Hall-Ellis Decl.	Declaration of Dr. Sylvia D. Hall-Ellis, filed concurrently herewith
15	Stubblebine Decl.	Declaration of Dr. Stuart Stubblebine, filed concurrently herewith
16	'408 Patent	U.S. Patent No. 8,225,408 [Mays Decl., Ex. 1]
17	'844 Patent	U.S. Patent No. 6,154,844 [Mays Decl., Ex. 2]
18	'494 Patent	U.S. Patent No. 8,677,494 [Mays Decl., Ex. 3]
19		
20	Medvidovic Rpt.	Excerpts of Expert Report of Nenad Medvidović, Ph.D., dated Dec. 1, 2020 [Mays Decl., Ex. 4]
21	Medvidovic Tr.	Excerpts of the Deposition Transcript of Nenad Medvidovic, Ph.D. taken Feb. 28, 2021 [Mays Decl., Ex. 12]
22		
23	Medvidovic IPR Decl.	Declaration of Nenad Medvidovic, Ph.D., Case No. IPR2015-2001 (June 21, 2016) [Mays Decl., Ex. 16]
24	Cole Rpt.	Excerpts of Opening Expert Report of Eric Cole, Ph.D., dated Dec. 1, 2020 [Mays Decl., Ex. 6]
25		
26	Hall-Ellis Tr.	Excerpts of Deposition Transcript of Syvlia Hall-Ellis, Ph.D., taken Mar. 1, 2021 [Mays Decl., Ex. 38]
27		
28	Stubblebine Tr.	Excerpts of Deposition Transcript of Stuart Stubblebine, Ph.D., taken Mar. 5, 2021 [Mays Decl., Ex. 36]

1	Cole Tr.	Excerpts of the Deposition Transcript of Eric Cole, Ph.D. taken Mar. 2, 2021 [Mays Decl., Ex. 9]
2		
3	Bachwani Tr.	Excerpts of the Deposition Transcript of Dilip Bachwani taken Sept 18, 2020 [Mays Decl., Ex. 22]
4		
5	Kruse Tr.	Excerpts of the Deposition Transcript of Holger Kruse taken Sept. 14, 2020 [Mays Decl., Ex. 19]
6		
7	Goodrich Rpt.	Excerpts of the Expert Report of Michael Goodrich Ph.D., dated Jan. 12, 2021 [Mays Decl., Ex. 10]
8	Goodrich Tr.	Excerpts of the Deposition Transcript of Michael Goodrich Ph.D., taken Feb. 26, 2021 [Mays Decl., Ex. 15]
9		
10	Goodrich Blue Coat Rpt.	Excerpts of the Rebuttal Expert Report of Michael Goodrich, Ph.D. in the Finjan v. Blue Coat Case No. 15-cv-03295-BLF-SVK, dated Apr. 21, 2017 [Mays Decl., Ex. 13]
11		
12	Goodrich Rapid7 Rpt.	Excerpts of the Rebuttal Expert Report of Michael T. Goodrich, Ph.D. in the Finjan v. Rapid7 Case, No. 18-cv-01519-MN, dated July 31, 2020 [Mays Decl., Ex. 14]
13		
14	Goodrich Sonicwall Rpt.	Excerpts of the Rebuttal Expert Report of Michael T. Goodrich, Ph.D. in the Finjan v. Sonicwall Case, No. 17-cv-04467-BLF, dated Oct. 9, 2020 [Mays Decl., Ex. 30]
15	Sonicwall Order	Order Granting in Part and Denying In Part Defendant's Motion For Partial Summary Judgment, No. 17-cv-04467-BLF, D.I. 320 (Mar. 5, 2021) [Mays Decl., Ex. 11]
16	'494 IPR	Patent Owner's Response, Case No. IPR2015-01892 (June 21, 2016) [Mays Decl., Ex. 31]
17	'844 IPR	Patent Owner's Response, Case No. IPR2019-00026 (July 2, 2019) [Mays Decl., Ex. 32]
18	Merriam-Webster Dictionary	Excerpts of 1997 Merriam-Webster Dictionary [Mays Decl., Ex. 24]
19		
20	Microsoft Computer Dictionary	Excerpts of Microsoft Computer Dictionary [Mays Decl., Ex. 8]
21	Medvidovic 10/28/16 Tr.	Excerpts of the Deposition Transcript of Nenad Medvidovic, Ph.D. taken Oct. 28, 2016 [Mays Decl., Ex.17]
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