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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

FINJAN, INC., a Delaware Corporation,  
  
Plaintiff,  
  
vs.  
  
SONICWALL INC., a Delaware  
Corporation  
  
Defendant.

Case No.: 5:17-cv-04467-BLF-VKD

**DEFENDANT SONICWALL INC.'S  
MOTION TO COMPEL FURTHER  
SUPPLEMENTAL INFRINGEMENT  
CONTENTIONS**

Date: March 12, 2019  
Time: 10:00 a.m.  
Dept: Courtroom 2, Fifth Floor  
Judge: Mag. Virginia K. DeMarchi

**REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED**

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1 **NOTICE OF MOTION AND MOTION**

2 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

3 PLEASE TAKE NOTICE that on March 12, 2019, at 10:00 a.m. or as soon thereafter as this matter  
4 may be heard, in the courtroom of the Honorable Virginia K. DeMarchi, at 280 S. 1st St, San Jose,  
5 CA 95113, Defendant SonicWall Inc. (“SonicWall”) will and hereby does move for an order  
6 compelling Plaintiff Finjan, Inc. (“Finjan”) to provide further supplemental infringement contentions  
7 that place SonicWall on notice of how its products specifically infringe the patent claims at issue  
8 within 30 days.

9 This motion is based on this notice of motion and motion, the supporting memorandum of  
10 points and authorities set forth below, the accompanying declaration of Robin L. McGrath  
11 (“McGrath Decl.”), the pleadings and papers on file with the Court and all other matters properly  
12 before this Court.

13 **STATEMENT OF RELIEF SOUGHT**

14 SonicWall seeks an Order from the Court compelling Finjan to serve further supplemental  
15 Infringement Contentions that comply with the Patent Local Rules by remedying the deficiencies  
16 described below.

17 **STATEMENT OF THE ISSUE TO BE DECIDED**

18 Whether Finjan’s Infringement Contentions fail to meet the standards set forth in the Patent  
19 Local Rules and fail to provide SonicWall with adequate notice of Finjan’s theories of infringement.

20 **MEMORANDUM OF POINTS AND AUTHORITIES**

21 **I. INTRODUCTION**

22 In other cases in this District, on many of the same patents, Finjan has been ordered to  
23 provide more specific infringement contentions. *See, e.g., Finjan, Inc. v. Zscaler, Inc.*, Case No. 17-  
24 cv-06946-JST, 2018 WL 4181906, at \*2 (N.D. Cal. Aug. 31, 2018) (finding Finjan failed to meet its  
25 “obligation to map specific elements of Defendant[’]s[] alleged infringing products onto the  
26 Plaintiff’s claim construction”) (citing *Finjan, Inc. v. Proofpoint, Inc.*, No. 13-CV-05808-HSG, 2015  
27 WL 1517920, at \*6 (N.D. Cal. Apr. 2, 2015)). Indeed, even after Finjan provided Court-ordered  
28 amended infringement contentions in *Zscaler*, the court there agreed that the amended contentions

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