

EXHIBIT 2

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15 *Attorneys for Plaintiff*
 16 FINJAN, INC.

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

20 FINJAN, INC., a Delaware Corporation,
 21
 22 Plaintiff,
 23
 24 v.
 25
 26 SONICWALL, INC., a Delaware Corporation,
 27
 28 Defendant.

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

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

1 Pursuant to the Order (Dkt. No. 93) and Patent Local Rules 3-1 and 3-2 of the United States
2 District Court for the Northern District of California, Plaintiff Finjan, Inc. (“Finjan”) makes the
3 following First Supplemental Disclosure of Asserted Claims and Infringement Contentions and
4 Document Production Accompanying Disclosure, including the attached claim charts (the
5 “Disclosure”) to SonicWall, Inc. (hereinafter “SonicWall” or “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/or 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, and/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 To the maximum degree allowed by the Federal Rules of Civil Procedure and the Court’s Local
20 Rules, Finjan reserves its right to supplement, amend, modify and/or narrow this Disclosure, as
21 appropriate, as the extent of infringement becomes more fully known, the Court makes any relevant
22 rulings (including claim construction), and the case develops over the course of discovery.

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

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

26 Finjan provides the following contentions pursuant to Patent Local Rule 3-1(a):
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28

1 Defendant directly infringed pursuant to 35 U.S.C. § 271(a) claims 1, 7, 15, 16, 41, and 43 of
2 U.S. Pat. No. 6,154,844 (the “844 Patent”); claims 10, 14, and 18 of U.S. Pat. No. 8,677,494 (the
3 “494 Patent”); claims 1, 9, and 10 of U.S. Pat. No. 7,058,822 (the “822 Patent”); claims 1, 9, 13, 14,
4 and 17 of U.S. Pat. No. 6,804,780 (the “780 Patent”); claims 1, 7, and 11 of U.S. Pat. No. 6,965,968
5 (the “968 Patent”); claims 22, 25, and 27 of U.S. Pat. No. 7,613,926 (the “926 Patent”); claims 1, 8,
6 9, and 14 of U.S. Pat. No. 7,647,633 (the “633 Patent”); claims 6, 11, 12, and 13 of U.S. Pat. No.
7 7,975,305 (the “305 Patent”); claims 1, 3, and 10 of U.S. Pat. No. 8,141,154 (the “154 Patent”); and
8 claims 1, 3, 4, 9, and 22 of U.S. Pat. No. 8,225,408 (the “408 Patent”).

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

13 **B. Identification of Accused Instrumentalities.**

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

15 Finjan accuses the following of Defendant’s products and/or services, and associated software
16 and subscriptions, of infringing claims 1, 7, 15, 16, 41, and 43 of the ‘844 Patent (“the ‘844 Asserted
17 Claims”): SonicWall Gateways,¹ SonicWall Email Security Appliance,² and SonicWall Capture ATP³,
18 identified in the attached Appendices A-1 through A-3 (“Accused Instrumentalities of the ‘844
19 Patent”).

20 Finjan accuses the following of Defendant’s products and/or services, and associated software
21 and subscriptions, of infringing claims 10, 14, and 18 of the ‘494 Patent (“the ‘494 Asserted Claims”):
22

23 ¹ A list of accused “SonicWall Gateways” is provided in Exhibit A attached hereto, and are
24 collectively referred to as “SonicWall Gateways.”

25 ² A list of the accused “SonicWall Email Security Appliance” products is provided in Exhibit A
26 attached hereto, and are collectively referred to as “SonicWall Email Security Appliance.”

27 ³ “Capture ATP” refers to Capture Advanced Threat Protection as described in
28 https://cdn.sonicwall.com/sonicwall.com/media/pdfs/datasheet/en_lr_datasheet-captureadvancedthreatprotection-a4-kj-mktg2923.pdf.

1 SonicWall Gateways, SonicWall Email Security Appliance, and SonicWall Capture ATP, identified in
2 the attached Appendices B-1 through B-3 (“Accused Instrumentalities of the ‘494 Patent”).

3 Finjan accuses the following of Defendant’s products and/or services, and associated software
4 and subscriptions, of infringing claims 1, 9, and 10 of the ’822 Patent (“the ‘822 Asserted Claims”):
5 SonicWall Gateways, SonicWall Email Security Appliance, and SonicWall Capture ATP, as identified
6 in the attached Appendices C-1 through C-3 (“Accused Instrumentalities of the ‘822 Patent”), and
7 Capture Client⁴ when used in conjunction with Capture ATP.

8 Finjan accuses the following of Defendant’s products and/or services, and associated software
9 and subscriptions, of infringing claims 1, 9, 13, 14, and 17 of the ’780 Patent (“the ‘780 Asserted
10 Claims”): SonicWall Gateways, SonicWall Email Security Appliance, and SonicWall Capture ATP,
11 identified in the attached Appendices D-1 through D-3 (“Accused Instrumentalities of the ‘780
12 Patent”).

13 Finjan accuses the following of Defendant’s products and/or services, and associated software
14 and subscriptions, of infringing claims 1, 3, 4, 9, and 22 of the ’408 Patent (“the ‘408 Asserted
15 Claims”): SonicWall Gateways, SonicWall Email Security Appliance, and SonicWall Capture ATP,
16 identified in the attached Appendices E-1 through E-3 (“Accused Instrumentalities of the ‘408
17 Patent”).

18 Finjan accuses the following of Defendant’s products and/or services, and associated software
19 and subscriptions, of infringing claims 22, 25, and 27 of the ’926 Patent (“the ‘926 Asserted Claims”):
20 SonicWall Gateways, SonicWall Email Security Appliance, and SonicWall Capture ATP, identified in
21 the attached Appendices F-1 through F-3 (“Accused Instrumentalities of the ‘926 Patent”).

22 Finjan accuses the following of Defendant’s products and/or services, and associated software
23 and subscriptions, of infringing claims 6, 11, 12, and 13 of the ’305 Patent (“the ‘305 Asserted
24 Claims”): SonicWall Gateways, SonicWall Email Security Appliance, and SonicWall Capture ATP,
25

26 ⁴ “Capture Client” refers to Capture Client Advanced as described in
27 <https://www.sonicwall.com/SonicWall.com/files/91/91fac4ec-2d9b-4150-8c06-2c402a16a86b.pdf>.

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