

1 Juanita R. Brooks (CA SBN 75934)
brooks@fr.com
2 Jason W. Wolff (CA SBN 215819)
wolff@fr.com
3 FISH & RICHARDSON P.C.
4 12860 El Camino Real, Ste. 400
San Diego, CA 92130
5 Tel.: (858) 678-5070
6 Fax: (858) 678-5099

DUANE MORRIS LLP
D. Stuart Bartow (SBN 233107)
Email: DS Bartow@duanemorris.com
Nicole E. Grigg (SBN 307733)
Email: NEGrigg@duanemorris.com
2475 Hanover Street
Palo Alto, CA 94304-1194
Tel.: 650.847.4150
Fax: 650.847.4151

7 *Additional counsel listed on
signature page*

*Additional counsel listed on
signature page*

8 Attorneys for Plaintiff
9 FINJAN LLC

Attorneys for Defendant
SONICWALL, INC.

10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION
14

15 FINJAN LLC, a Delaware Limited Liability
16 Company,

17 Plaintiff,

18 v.

19 SONICWALL, INC., a Delaware
20 Corporation,

21 Defendant.
22
23
24
25
26
27
28

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

**JOINT MOTION AND ~~PROPOSED~~ ORDER
TO EXTEND TIME FOR SUBMISSION OF
JURY INSTRUCTIONS AND VERDICT FORM**

1 Plaintiff Finjan LLC (“Finjan”) and Defendant SonicWall, Inc. (“SonicWall”) (collectively,
2 “the Parties”), respectfully move the Court to extend the time by which the Parties are required to
3 file the proposed jury instructions and verdict form.

4 Trial in this matter is scheduled to begin on Monday, May 3, 2021, and the final pretrial
5 conference is set for Thursday, March 18, 2021. D.I. 48. The Court’s Standing Order requires the
6 Parties to submit the proposed jury instructions and verdict form in this matter by March 11, 2021,
7 at least 7 days before the final pretrial conference. In light of the Court’s order on SonicWall’s
8 Motion for Partial Summary Judgment issued on March 5, 2021, and order directing SonicWall to
9 specify the remaining issues in its pending motion to strike (D.I. 387), the Parties respectfully
10 request that the Court amend the deadline to file the jury instructions and verdict form to April 9,
11 2021, to allow the parties to fully assess the orders’ impact on the remaining asserted claims and
12 patents and, by extension, the scope of the jury instructions, position statements therein, and verdict
13 form. The Parties still intend to file proposed voir dire and the juror questionnaire on March 11,
14 2021.

15 The Parties submit that the requested extension of the deadline to file the jury instructions
16 and verdict form will not impact the Court’s scheduled trial date or the resolution of any outstanding
17 objections prior to trial, per the Court’s Standing Order for Civil Trials.

18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted,

By: /s/ Proshanto Mukherji
Juanita R. Brooks (CA SBN 75934)
brooks@fr.com
Jason W. Wolff (CA SBN 215819)
wolff@fr.com
FISH & RICHARDSON P.C.
12860 El Camino Real, Ste. 400
San Diego, CA 92130
Telephone: (858) 678-5070

Proshanto Mukherji (*Pro Hac Vice*)
mukherji@fr.com
FISH & RICHARDSON P.C.
One Marina Park Drive
Boston, MA 02210
Telephone: (617) 542-5070

Robert Courtney (CA SNB 248392)
courtney@fr.com
FISH & RICHARDSON P.C.
3200 RBC Plaza
60 South Sixth Street
Minneapolis, MN 55402
Telephone: (612) 335-5070

Attorneys for Plaintiff
FINJAN LLC

Dated: March 8, 2021

Respectfully submitted,

By: /s/ Alice Snedeker
Matthew C. Gaudet (*Pro Hac Vice*)
mcgaudet@duanemorris.com
David C. Dotson (*Pro Hac Vice*)
dcdotson@duanemorris.com
Jennifer H. Forte (*Pro Hac Vice*)
jhforte@duanemorris.com
Alice E. Snedeker (*Pro Hac Vice*)
aesnedeker@duanemorris.com
DUANE MORRIS LLP
1075 Peachtree NE, Suite 2000
Atlanta, GA 30309-3929
Telephone: 404.253.6900

D. Stuart Bartow (SBN 233107)
Email: DSBartow@duanemorris.com
Nicole E. Grigg (SBN 307733)
Email: NEGrigg@duanemorris.com
DUANE MORRIS LLP
2475 Hanover Street
Palo Alto, CA 94304-1194
Telephone: 650.847.4150

Joseph A. Powers (*Pro Hac Vice*)
Email: japowers@duanemorris.com
Jarrad M. Gunther (*Pro Hac Vice*)
Email: jmgunther@duanemorris.com
DUANE MORRIS LLP
30 South 17th Street
Philadelphia, PA 19103
Telephone: 215.979.1000

Attorneys for Defendant
SONICWALL, INC.

~~PROPOSED~~ ORDER

Pursuant to Parties' Stipulated Request, the schedule is changed as follows:

Event	Current Deadline	New Deadline
Deadline to file Joint Pretrial Statement & Order (excluding deposition designations)	March 4, 2021	No change
Deadline to file proposed voir dire and juror questionnaire	March 11, 2021	No change
Final pretrial conference	March 18, 2021	No change
Deadline to file Jury Instructions and Verdict Form	March 11, 2021	April 9, 2021
Deadline to file pretrial briefs	April 26, 2021	No change
Trial	May 3, 2021	No change

IT IS SO ORDERED.

Dated: March 9, 2021



 JUDGE BETH LABSON FREEMAN
 United States District Court Judge