UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SYMANTEC CORP.

Petitioner

v.

FINJAN, INC.,

Patent Owner

Case IPR2015-01547

Patent No. 8,141,154

PATENT OWNER'S PRELIMINARY RESPONSE UNDER 37 C.F.R. § 42.107

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IV.	SPECIFIC REASONS WHY THE CITED REFERENCES DO NOT INVALIDATE THE CLAIMS, AND WHY INTER PARTES REVIEW SHOULD NOT BE INSTITUTED		
	A. Ground 1: Ross Does Not Anticipate Claims 1–5 Under 35 U.S.C. § 102(e)		
		1.	Ross does not disclose "a system for protecting a computer from dynamically generated malicious content" (claim 1)10
		2.	Ross does not disclose "a content processor (i) for processing content received over a network, the content including a call to a first function, and the call including an input" (claims 1 and 4)
		3.	Ross does not disclose "invoking a second function with the input, only if a security computer indicates that such invocation is safe" (claims 1 and 4)
		4.	Ross does not disclose "wherein the input is dynamically generated by said content processor prior to being transmitted by said transmitter" (claims 3 and 5)
	B. Ground 2: Ross Does Not Render Claims 2, 4-8, 10, and 11 Obvious Under 35 U.S.C. § 103(a)19		
		1.	Ross does not disclose "a content processor (i) for processing content received over a network, the content including a call to

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Patent Owner's Preliminary Response IPR2015-01547 (U.S. Patent No. 8,141,154) a first function, and the call including an input" (claims 4, 6, Ross does not disclose "calling a second function with a 2. Ground 3: Ross in view of Calder Does Not Render Claims 9 and 12 Obvious Under 35 U.S.C. § 103(a)......20 Ross in view of Calder fails to show or suggest "wherein the 1. input variable includes a call to an additional function, and wherein the modified input variable includes a call to a modified additional function instead of the call to the additional Ground 4: Calder in view of Sirer Does Not Render Claims 1–12 1. Calder in view of Sirer does not disclose "a content processor (i) for processing content received over a network, the content including a call to a first function, and the call including an input" (claims 1, 4, 6, and 10).....29 2. Calder in view of Sirer does not disclose a content processor "(ii) for invoking a second function with the input, only if a security computer indicates that such invocation is safe" (claims Calder in view of Sirer does not disclose "calling a second 3. function with a modified input variable" (claims 6 and 10).....32 4. Calder in view of Sirer does not disclose "wherein the input is dynamically generated by said content processor prior to being transmitted by said transmitter" (claims 3, 5, 8, and 11)......32 Calder in view of Sirer does not disclose "wherein the input 5. variable includes a call to an additional function, and wherein the modified input variable includes a call to a modified additional function instead of the call to the additional function"

C.

D.

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