

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SYMANTEC CORP., and
BLUE COAT SYSTEMS, INC.,
Petitioner,

v.

FINJAN, INC.,
Patent Owner.

Case IPR2015-01892¹
U.S. Patent No. 8,677,494

**PATENT OWNER'S IDENTIFICATION OF ARGUMENTS EXCEEDING
THE PROPER SCOPE OF REPLY**

¹ Case IPR2016-00890 has been joined with the instant proceeding.

Pursuant to the Board's October 26, 2016 Order (Paper 37), Patent Owner Finjan, Inc. identifies the following portions of Petitioner's Reply that exceed the proper scope of reply:

1. Pg. 5, line 17–Pg. 6, line 1, Exhibit 1035.
2. Pg. 9, lines 16-18.
3. Pg. 11, lines 18-19, Exhibit 1029 at 10 (cited as MSCD at 10), Exhibit 1027 at ¶¶69-70 (cited as Davidson Rep., ¶¶65-74).
4. Pg. 13, lines 9-12, Exhibit 1027 at ¶¶47-52 (cited as Davidson Rep., ¶¶47-52).
5. Pg. 13, lines 15-18.
6. Pg. 14, lines 5-7, Exhibit 1027 at ¶¶47-53 (cited as Davidson Rep., ¶¶47-53).
7. Pg. 14, lines 9-12, Line 9, Exhibit 1027 at ¶¶54-56 (cited as Davidson Rep., ¶¶54-56).
8. Pg. 14, line 19, Exhibit 1027 at ¶¶10-17 (cited as Davidson Rep., ¶¶ 10-17).
9. Pg. 15, line 1, Exhibit 1029 at 7 (cited as MSCD at 7).
10. Pg. 16, lines 1-6, Figure shown on line 5, Exhibit 1027 at ¶¶23-27 (cited as Davidson Rep., ¶¶ 23-27).
11. Pg. 16, line 14–Pg. 17, line 5, Exhibit 1031 (cited as Fowler).

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12. Pg. 17, lines 7-8, Exhibit 1031 (cited as Fowler).
13. Pg. 17, line 11, Exhibit 1027 at ¶¶32-33 (cited as Davidson Rep., ¶¶32-33).
14. Pg. 17, lines 16-20, Exhibit 1027 at ¶¶41-46 (cited as Davidson Rep., ¶¶41-46).
15. Pg. 18, lines 2-5, Exhibit 1027 at ¶¶57-62 (cited as Davidson Rep., ¶¶57-62).
16. Pg. 18, lines 5-6, Exhibit 1027 at ¶¶63-64 (cited as Davidson Rep., ¶¶63-64).
17. Pg. 18, line 17–Pg. 19, line 3, Exhibit 1032 (cited as Denning).
18. Pg. 19, lines 9-14, Exhibit 1027 at ¶¶103-111 (cited as Davidson Rep., ¶¶103-111).
19. Pg. 23, lines 16-17, Exhibit 1026.
20. Pg. 24, line 2, Exhibit 1037.
21. Pg. 24, line 15–Pg. 25, line 20, Exhibits 1038, 1041, 1026.
22. Petitioner’s Exhibits: Symantec 1026, 1027, 1029-1033, 1035, 1037-1043.

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Respectfully submitted,

Dated: November 9, 2016

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that a true and correct copy of the foregoing Patent Owner's Identification of Arguments Exceeding the Proper Scope of Reply was served on November 9, 2016, by filing this document through the Patent Review Processing System as well as delivering via electronic mail upon the following counsel of record for Petitioner and Joinder

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