

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PALO ALTO NETWORKS, INC.,
Petitioner,

v.

FINJAN, INC.,
Patent Owner.

Case IPR2015-01979
Patent 8,141,154

PATENT OWNER'S LIST OF PROPOSED MOTIONS

Patent Owner, Finjan, Inc., provides a list of the proposed motions it presently expects it may file in the above-captioned *inter partes* review proceeding. Pursuant to the Board's Scheduling Order, a first motion to amend claims, motions for observations on cross-examination, and motions to exclude evidence are automatically authorized by the Board. *See* IPR 2015-01979, Paper 9 (PTAB Mar. 21, 2016). Accordingly, these proposed motions are not included in Patent Owner's list of Proposed Motions. Further, it is Patent Owner's understanding that, as stated in the Trial Practice Guide (at 48,765), "[s]ubmission of [this] list would not preclude the filing of additional motions not contained in the list." Patent Owner also reserves the right to file opposition(s) to Petitioner's motion(s) as permitted under the appropriate rules.

PATENT OWNER'S PROPOSED MOTIONS

1. Motion to seal pursuant to 37 C.F.R. § 42.54;
2. Motion to compel deposition dates and location of declarants in United States;
3. Possible motion for additional discovery pursuant to 37 C.F.R. § 42.51; and
4. Possible motion to file supplemental information pursuant to 37 C.F.R. § 42.123.

Patent Owner's List of Proposed Motions
IPR2015-01979 (U.S. Patent No. 8,141,154)

Respectfully submitted,

Dated: April 25, 2016

/James Hannah/

James Hannah (Reg. No. 56,369)
Kramer Levin Naftalis & Frankel LLP
990 Marsh Road
Menlo Park, CA 94025
Tel: 650.752.1700 Fax: 212.715.8000

Jeffrey H. Price (Reg. No. 69,141)
Kramer Levin Naftalis & Frankel LLP
1177 Avenue of the Americas
New York, NY 10036
Tel: 212.715.7502 Fax: 212.715.8302

Michael Kim (Reg. No. 40,450)
Finjan, Inc.
2000 University Ave., Ste. 600
E. Palo Alto, CA 94303
Tel: 650.397.9567
mkim@finjan.com

(Case No. IPR2015-01979)

Attorneys for Patent Owner

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 List of Proposed Motions was served on April 25, 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:

Orion Armon
Brian Eutermoser
COOLEY LLP
380 Interlocken Crescent, Suite 900
Broomfield, Colorado 80021
oarmon@cooley.com
beutermoser@cooley.com
zpatdcdocketing@cooley.com

Max Colice
COOLEY LLP
500 Boylston Street, 14th Floor
Boston, Massachusetts 02116-3736
mcolice@cooley.com
zpatdcdocketing@cooley.com

Jennifer Volk-Fortier
COOLEY LLP
One Freedom Square
Reston Town Center
11951 Freedom Drive
Reston, Virginia 2019
jvolkfortier@cooley.com
zpatdcdocketing@cooley.com

/James Hannah/

James Hannah (Reg. No. 56,369)
Kramer Levin Naftalis & Frankel LLP
990 Marsh Road,
Menlo Park, CA 94025
(650) 752-1700