

Petition for *Inter Partes* Review of
Patent No. 6,804,780

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Palo Alto Networks, Inc.,
Petitioner

v.

Finjan, Inc.,
Patent Owner

Patent No. 6,804,780

Filing Date: March 30, 2000

Issue Date: Oct. 12, 2004

Title: System and Method for Protecting a Computer and a Network from Hostile
Downloadables

Inter Partes Review No. IPR2016-00165

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,804,780

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EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 6,804,780 to Touboul (“the ’780 patent”)
1002	Declaration of Dr. Aviel D. Rubin
1003	U.S. Patent No. 5,638,446 to Rubin (“Rubin”)
1004	U.S. Patent No. 5,815,709 to Waldo (“Waldo”)
1005	File History for U.S. Patent No. 6,804,780 to Touboul (“’780 file history”)
1006	Provisional Application No. 60/030,639 (the “’639 provisional”)
1007	U.S. Patent No. 5,978,484 to Apperson (“Apperson”)
1008	“Microsoft Authenticode Analyzed” (“Khare”)
1009	<i>Finjan v. Blue Coat</i> Claim Construction Order
1010	<i>Finjan v. Blue Coat</i> trial transcript excerpt
1011	<i>Finjan v. BlueCoat</i> verdict form

Palo Alto Networks, Inc. (“Petitioner”) respectfully submits this Petition for *inter partes* review (“Petition”) of claims 1-18 (“Petitioned Claims”) of U.S. Patent No. 6,804,780 (“the ’780 patent”) under 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42.100 et seq.

I. INTRODUCTION

A. The ’780 Patent

The ’780 patent is entitled “System and Method for Protecting a Computer and a Network from Hostile Downloadables.” The specification of the ’780 patent discusses various techniques for analyzing content downloaded from the Internet (a “Downloadable”) to determine whether it is malicious and should be blocked. (Ex. 1001 at 1:66-2:44.) The claims of the ’780 patent, however, are broadly directed to the basic concept of receiving a Downloadable and one or more of its fetched software components and performing mathematical calculations (or “hashing”) on them to generate an identifier (a so-called “Downloadable ID”). Claim 1 is representative:

1. A computer-based method for generating a Downloadable ID to identify a Downloadable, comprising:
obtaining a Downloadable that includes one or more references to software components required to be executed by the Downloadable;

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