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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BLUE COAT SYSTEMS, INC.,
Petitioner,

v.

FINJAN, INC.,
Patent Owner.

Case No. IPR2016-00492
Patent No. 6,804,780

PETITION FOR *INTER PARTES* REVIEW

PURSUANT TO 37 C.F.R. § 42.100 *et seq.*

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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	Order Construing Claims in U.S. Patent Nos. 6,154,844; 7,058,822; 7,418,731; 7,647,633, *Finjan, Inc. v. Blue Coat Systems, Inc.*, Case No. 5-13-cv-03999 (N.D. Cal. 2013)
1010	*Finjan, Inc. v. Blue Coat Systems, Inc.*, Trial Transcript Excerpt, Case No. 5-13-cv-03999 (2015)
1011	*Finjan, Inc. v. Blue Coat Systems, Inc.*, Verdict Form, Case No. 5-13-cv-03999 (2015)
1012	*Finjan, Inc. v. Blue Coat Systems, Inc.*, No. 5:13-cv-03999
1013	*Finjan, Inc. v. Blue Coat Systems, Inc.*, No. 5:15-cv-03295

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Blue Coat Systems, Inc. ("Petitioner" or "Blue Coat") 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.

A previous petition for *inter partes* review of the '780 patent, *Palo Alto Networks, Inc. v. Finjan, Inc.*, IPR2016-00165, has been filed by Palo Alto Networks, Inc. A motion for joinder to that petition has been filed concurrent with this Petition.

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

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