Filed on behalf of Symantec Corporation

By: Joseph J. Richetti Bryan Cave LLP

1290 Avenue of the Americas

New York, NY 10104 Tel: (212) 541-2000 Fax: (212) 541-4630

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SYMANTEC CORP.
Petitioner

V.

FINJAN, INC. Patent Owner

Case: To Be Assigned U.S. Patent No. 6,154,844

PETITION FOR *INTER PARTES* REVIEW PURSUANT TO 37 C.F.R. § 42.100 et seq.



TABLE OF CONTENTS

I.	MA	NDATORY NOTICES (37 C.F.R. § 42.8)				
II.	GRO	OUNDS FOR STANDING (37 C.F.R. § 42.104(a))				
III.	IDENTIFICATION OF CHALLENGE (37 C.F.R. § 42.104(b))					
	A.	Claims for Which Review Is Requested				
	B.	Priority Date of the '844 Patent				
	C.	The Specific Art on Which the Challenge Is Based				
	D.	The Statutory Grounds on Which the Challenge Is Based	8			
IV.	OVERVIEW OF THE '844 PATENT					
	A.	The Specification	8			
	B.	The Challenged Claims	11			
V.	LEV	EL OF ORDINARY SKILL	13			
VI.	CLAIM CONSTRUCTION					
	A.	"Means for Receiving"				
	B.	"Means for Generating"				
	C.	"Means for Linking"	16			
VII.	GRC	OUNDS OF UNPATENTABILITY	17			
	A.	Ground 1: Dan Renders Obvious Claims 1, 7, 11, 15, 16, 41, and 43	17			
		1. Dan renders obvious independent claims 1, 15, 41, and 43	19			
		a. Dan teaches a method (1[Pre]); an inspector system (15[Pre], 43[Pre]); and a computer-readable storage medium (41[Pre]).	19			
		b. Dan teaches a [means for] receiving [by an inspector] a Downloadable (1[A], 41[A], 43[A])	20			



		c.	Dan teaches a [means for] generating [by the inspector] a first Downloadable security profile that identifies suspicious code in a Downloadable (1[C], 41[C], 43[C])	.22
		d.	Dan teaches a memory storing a rule set (15[B]); and a content inspection engine for using the rule set to generate a DSP that identifies suspicious code in a Downloadable (15[C])	.25
		e.	Dan teaches [a first content inspection engine/means for] linking [by the inspector] the first DSP to the Downloadable before a web server makes the Downloadable available to web clients (1[D], 15[D], 41[D], 43[D])	.26
	2.	Dan	renders obvious dependent claim 7	.28
	3.	Dan	renders obvious dependent claim 11	.28
	4.	Dan	renders obvious dependent claim 16	.29
В.			Apperson in view of Ji and further in view of Cline byious Claims 1, 7, 11, 15, 16, 41, and 43	.30
	1.		erson in view of Ji and Cline renders obvious pendent claims 1, 15, 41, and 43	.31
		a.	Apperson in view of Ji and Cline teaches a method (1[Pre]); an inspector system (15[Pre], 43[Pre]); and a computer-readable storage medium (41[Pre])	.31
		b.	Apperson in view of Ji and Cline teaches receiving a Downloadable (1[A], 41[A], 43[A])	.32
		c.	Apperson in view of Ji and Cline teaches [a means for] generating [by the inspector] a DSP that identifies suspicious code in a Downloadable (1[C], 41[C], 43[C])	.36
		d.	Apperson in view of Ji and Cline teaches memory storing a rule set (15[B]); and a content inspection	



			engine for using the first rule set to generate a DSP (15[C])	.41
		e.	Apperson in view of Ji and Cline teaches linking the DSP to the Downloadable before a web server makes it available to web clients (1[D], 15[D], 41[D], 43[D])	.43
	2.	App	person in view of Ji and Cline renders obvious claim 7	.45
	3.	App	person in view of Ji and Cline renders obvious claim 11	.45
	4.	App	person in view of Ji and Cline renders obvious claim 16	.46
C.			Anand in view of Cline Renders Obvious Claims 1, 7, 41, and 43	.47
	1.		and in view of Cline renders obvious independent claims 5, 41, and 43	.48
		a.	Anand in view of Cline teaches a method (1[Pre]); an inspector system (15[Pre], 43[Pre]); and a computer-readable storage medium on an inspector (41[Pre])	.48
		b.	Anand in view of Cline teaches a [means for] receiving [by an inspector] a Downloadable (1[A], 15[A], 41[A], 43[A])	.50
		c.	Anand in view of Cline teaches a generating a DSP that identifies suspicious code in a Downloadable (1[C], 41[C], 43[C])	.52
		d.	Anand in view of Cline teaches a memory storing a rule set (15[B]); and a content inspection engine for using the rule set to generate a DSP (15[C])	.55
		e.	Anand in view of Cline teaches linking the DSP to the Downloadable before a web server makes the Downloadable available to web clients (1[D], 15[D], 41[D], 43[D])	.56
	2.	Anand in view of Cline renders obvious dependent claim 7		
	3.	Ana	and in view of Cline renders obvious dependent claim 11	.59



	4.	Anand in view of Cline renders obvious dependent claim 1	1659
VIII.	CONCLUS	ON	60



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

