

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PALO ALTO NETWORKS, INC.
Petitioner

v.

JUNIPER NETWORKS, INC.
Patent Owner

CASE IPR2013-00369
Patent 7,107,612

JUNIPER'S CONTINGENT MOTION TO AMEND
UNDER 37 C.F.R. § 42.121

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I. STATEMENT OF RELIEF REQUESTED

In this contingent motion to amend, Juniper respectfully requests that the following substitute claims be entered if the original claims of the '612 patent are cancelled. The claims as amended further establish that the '612 patent approach of dynamically adding and modifying rules that exist across multiple sessions is fundamentally different from the prior art approaches at the time of invention.

II. JUNIPER'S PROPOSED SUBSTITUTE CLAIMS

A listing and short discussion of the form of the substitute claims is included below. The form of the substitute claims complies with the Board's requirements, as specified, for example, in *Toyota Motor Corp. v. American Vehicular Sciences LLC*, IPR2013-00423, Paper 27 (March 7, 2014).

A. Substitute claim listing

[1] 29. A method, comprising:

establishing a set of rules for controlling access to and from a network device for incoming and outgoing data units;

receiving, at the network device, a first sequence of data units; and

adding one or more first rules to the set of rules based on data extracted from the received first sequence of data units, wherein said first rules exist across multiple sessions.

[2] 30. The method of claim [1] 29, further comprising:

filtering other data units received at the network device based on the set of rules comprising:

determining whether the other data units match one of the rules of the set of rules;

denying access to any of the other data units that match one of the rules of the set of rules; and

permitting access to any of the other data units that do not match one of the rules of the set of rules.

Original claim 3 is cancelled.

[6] 31. The method of claim [1] 29, wherein the network device is coupled to a private network and to a public network and the method further comprises:

receiving data units from the public network, wherein headers associated with the data units include a network address and port number associated with a firewall implemented at the network device; and

replacing, in the headers for each of the data units, the network address and port number associated with the firewall with network addresses and port number associated with corresponding destination nodes in the private network.¹

[13] 32. A network device, comprising:

an access control engine configured to establish a set of rules for controlling access to and from the network device for incoming and outgoing data units; and

a dynamic filter configured to add one or more first rules to the set of rules based on data extracted from a first sequence of data units received at the network

¹ Juniper presents this substitute dependent claim as an exemplar only. *See* Ex. 2042 (3/19/14 Hearing Transcript) at 10:5-9.

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