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 PALO ALTO NETWORKS, INC.

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

13 PALO ALTO NETWORKS, INC.,
 14 Plaintiff,
 15 v.
 16 JUNIPER NETWORKS, INC.
 17 Defendant.

Case No.
**COMPLAINT FOR PATENT
 INFRINGEMENT**
DEMAND FOR JURY TRIAL

19 Plaintiff Palo Alto Networks, Inc. complains and alleges as follows:

20 **NATURE OF THE ACTION**

21 1. This is an action for patent infringement arising under the Patent Laws of the
 22 United States, 35 U.S.C. §§ 1, *et seq.*

23 **THE PARTIES**

24 2. Plaintiff Palo Alto Networks, Inc. (“PAN”) is a Delaware corporation having its
 25 principal place of business at 3300 Olcott Street, Santa Clara, California 95054.

26 3. On information and belief, Defendant Juniper Networks, Inc. (“Juniper”) is a
 27 Delaware corporation having its principal place of business at 1194 North Mathilda Avenue,
 28 Sunnyvale, California 94089.

1 **JURISDICTION AND VENUE**

2 4. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

3 5. This Court has personal jurisdiction over Juniper because Juniper has conducted
4 and conducts business in this District, has committed and continues to commit acts of patent
5 infringement in this District, and has harmed and continues to harm PAN by making, using,
6 offering to sell, or selling infringing products and services in this District.

7 6. Venue is proper in this District under 28 U.S.C. §§ 1391(b) and 1400(b).

8 **INTRADISTRICT ASSIGNMENT**

9 7. This is an Intellectual Property Action to be assigned on a district-wide basis
10 pursuant to Civil Local Rule 3-2(c).

11 **COUNT I**

12 **INFRINGEMENT OF U.S. PATENT NO. 5,887,139**

13 8. PAN incorporates and re-alleges paragraphs 1 through 7 of this Complaint.

14 9. PAN is the owner by assignment of U.S. Patent No. 5,887,139 (“the ’139 patent”).
15 The ’139 patent duly and legally issued on March 23, 1999 and is entitled “Configurable
16 Graphical User Interface Useful in Managing Devices Connected to a Network.”

17 10. Juniper has infringed and continues to infringe one or more claims of the ’139
18 patent in violation of 35 U.S.C. § 271. Juniper’s acts of infringement include direct infringement
19 by making, using, offering to sell, or selling its J Series, M Series, MX Series, T Series, and TX
20 Matrix routers, SRX Series and MAG Series gateways, and EX Series and QFX Series switches
21 with Junos software and its J-Web network management application in the United States,
22 including in this District.

23 11. Juniper committed these acts of infringement without license or authorization.

24 12. As a result of Juniper’s infringement of the ’139 patent, PAN has suffered
25 damages and will continue to suffer damages.

26 13. Juniper will continue to infringe unless this Court enjoins Juniper and its agents,
27 servants, employees, representatives, and all others acting in active concert with it from infringing
28 the ’139 patent.

1 **COUNT II**

2 **INFRINGEMENT OF U.S. PATENT NO. 7,779,096**

3 14. PAN incorporates and re-alleges paragraphs 1 through 7 of this Complaint.

4 15. PAN is the owner by assignment of U.S. Patent No. 7,779,096 (“the ’096 patent”).
5 The ’096 patent duly and legally issued on August 17, 2010 and is entitled “System and Method
6 for Managing a Shared Streaming Media Service.”

7 16. Juniper has infringed and continues to infringe one or more claims of the ’096
8 patent in violation of 35 U.S.C. § 271. Juniper’s acts of infringement include direct infringement
9 by making, using, offering to sell, or selling its VXA Series Content Engines and Junos Content
10 Encore software in the United States, including in this District.

11 17. Juniper committed these acts of infringement without license or authorization.

12 18. As a result of Juniper’s infringement of the ’096 patent, PAN has suffered
13 damages and will continue to suffer damages.

14 19. Juniper will continue to infringe unless this Court enjoins Juniper and its agents,
15 servants, employees, representatives, and all others acting in active concert with it from infringing
16 the ’096 patent.

17 **COUNT III**

18 **INFRINGEMENT OF U.S. PATENT NO. 7,797,439**

19 20. PAN incorporates and re-alleges paragraphs 1 through 7 of this Complaint.

20 21. PAN is the owner by assignment of U.S. Patent No. 7,797,439 (“the ’439 patent”).
21 The ’439 patent duly and legally issued on September 14, 2010 and is entitled “Cost-Aware
22 Admission Control for Streaming Media Server.”

23 22. Juniper has infringed and continues to infringe one or more claims of the ’439
24 patent in violation of 35 U.S.C. § 271. Juniper’s acts of infringement include direct infringement
25 by making, using, offering to sell, or selling its VXA Series Content Engines and Junos Content
26 Encore software in the United States, including in this District.

27 23. Juniper committed these acts of infringement without license or authorization.

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DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Palo Alto Networks, Inc. hereby demands trial by jury on all issues raised by the Complaint.

Dated: September 30, 2013

MORRISON & FOERSTER LLP

By: /s/ Michael A. Jacobs
MICHAEL A. JACOBS

Attorneys for Plaintiff
PALO ALTO NETWORKS, INC.