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8	Attorneys for Plaintiff PALO ALTO NETWORKS, INC.		
9	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA		
12			
13	PALO ALTO NETWORKS, INC.,	Case No.	
14	Plaintiff,	COMPLAINT FOR PATENT INFRINGEMENT	
15	V.	DEMAND FOR JURY TRIAL	
16	JUNIPER NETWORKS, INC.	DEMAND FOR JUNE 1 RIAL	
17	Defendant.		
18		J	
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, Defe	ndant Juniper Networks, Inc. ("Juniper") is a	
27	Delaware corporation having its principal place of business at 1194 North Mathilda Avenue,		
28	Sunnyvale, California 94089.		
	COMPLAINT FOR PATENT INFRINGEMENT CASE NO. sf-3332083		

## 1 **JURISDICTION AND VENUE** 4. 2 This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a). 5. 3 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. 11. 23 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. 15. 4 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. 18. 12 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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1	24.	As a result of Juniper's infringement of the '439 patent, PAN has suffered	
2	damages and will continue to suffer damages.		
3	25.	Juniper will continue to infringe unless this Court enjoins Juniper and its agents,	
4	servants, em	rvants, employees, representatives, and all others acting in active concert with it from infringir	
5	the '439 patent.		
6	PRAYER FOR RELIEF		
7	WHEREFORE, PAN prays for relief, as follows:		
8	1.	A judgment that Juniper has infringed the '139, '096, and '439 patents;	
9	2.	An injunction barring Juniper and its officers, directors, agents, servants,	
10	employees, affiliates, attorneys, and all others acting in privity or in concert with them, and their		
11	parents, subsidiaries, divisions, successors and assigns, from further acts of infringement of		
12	PAN's asserted patents;		
13	3.	An award of damages adequate to compensate for Juniper's infringement of	
14	PAN's asserted patents, and in no event less than a reasonable royalty for PAN's acts of		
15	infringement, including all pre-judgment and post-judgment interest at the maximum rate		
16	permitted by law;		
17	4.	An award of trebled damages under 35 U.S.C. § 284;	
18	5.	A declaration that this case is exceptional under 35 U.S.C. § 285;	
19	6.	An award of PAN's costs and attorneys' fees under 35 U.S.C. § 285; and	
20	7.	Any other remedy to which PAN may be entitled.	
21	Dated: Septe	ember 30, 2013 MORRISON & FOERSTER LLP	
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23		By: <u>/s/ Michael A. Jacobs</u>	
24		MICHAEL A. JACOBS	
25		Attorneys for Plaintiff PALO ALTO NETWORKS, INC.	
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1	DEMAND FOR JURY TRIAL		
2	Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Palo Alto Networks, Inc.		
3	hereby demands trial by jury on all issues raised by the Complaint.		
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5	Dated: September 30, 2013 MORRISON & FOERSTER LLP		
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7	By: <u>/s/ Michael A. Jacobs</u> MICHAEL A. JACOBS		
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9	Attorneys for Plaintiff PALO ALTO NETWORKS, INC.		
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