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8 *Attorneys for Plaintiff*
9 FINJAN, INC.

10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13 FINJAN, INC., a Delaware Corporation,
14 Plaintiff,
15 v.
16 ZSCALER, INC., a Delaware Corporation,
17 Defendant.

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

1 **COMPLAINT FOR PATENT INFRINGEMENT**

2 Plaintiff Finjan, Inc. (“Finjan”) files this Complaint for Patent Infringement and Demand for
3 Jury Trial against Zscaler, Inc. (“Defendant” or “Zscaler”) and alleges as follows:

4 **THE PARTIES**

5 1. Finjan is a Delaware Corporation with its principal place of business at 2000
6 University Avenue, Suite 600, E. Palo Alto, California 94303.

7 2. Defendant is a Delaware Corporation with its headquarters and principal place of
8 business at 110 Rose Orchard Way, San Jose, California 95134. Defendant may be served through its
9 agent for service of process, Corporate Service Center of California, at 2030 Main Street 13th Floor,
10 Irvine, California 92614.

11 **JURISDICTION AND VENUE**

12 3. This action arises under the Patent Act, 35 U.S.C. § 101 *et seq.* This Court has
13 original jurisdiction over this controversy pursuant to 28 U.S.C. §§ 1331 and 1338.

14 4. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b) and (c) and/or 1400(b).

15 5. This Court has personal jurisdiction over Defendant. Upon information and belief,
16 Defendant is headquartered and has its principal place of business in this District (San Jose,
17 California). Defendant also regularly and continuously does business in this District and has
18 infringed or induced infringement, and continues to do so, in this District. In addition, this Court has
19 personal jurisdiction over Defendant because minimum contacts have been established with this
20 forum and the exercise of jurisdiction would not offend traditional notions of fair play and substantial
21 justice.

22 **INTRADISTRICT ASSIGNMENT**

23 6. Pursuant to Local Rule 3-2(c), Intellectual Property Actions are assigned on a district-
24 wide basis.

25 **FINJAN’S INNOVATIONS**

26 7. Finjan was founded in 1997 as a wholly-owned subsidiary of Finjan Software Ltd., an
27 Israeli corporation. In 1998, Finjan moved its headquarters to San Jose, California. Finjan was a
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1 pioneer in developing proactive security technologies capable of detecting previously unknown and
2 emerging online security threats, recognized today under the umbrella term “malware.” These
3 technologies protect networks and endpoints by identifying suspicious patterns and behaviors of
4 content delivered over the Internet. Finjan has been awarded, and continues to prosecute, numerous
5 patents covering innovations in the United States and around the world resulting directly from
6 Finjan’s more than decades-long research and development efforts, supported by a dozen inventors
7 and over \$65 million in R&D investments.

8 8. Finjan built and sold software, including application program interfaces (APIs) and
9 appliances for network security, using these patented technologies. These products and related
10 customers continue to be supported by Finjan’s licensing partners. At its height, Finjan employed
11 nearly 150 employees around the world building and selling security products and operating the
12 Malicious Code Research Center, through which it frequently published research regarding network
13 security and current threats on the Internet. Finjan’s pioneering approach to online security drew
14 equity investments from two major software and technology companies, the first in 2005 followed by
15 the second in 2006. Finjan generated millions of dollars in product sales and related services and
16 support revenues through 2009, when it spun off certain hardware and technology assets in a merger.
17 Pursuant to this merger, Finjan was bound to a non-compete and confidentiality agreement, under
18 which it could not make or sell a competing product or disclose the existence of the non-compete
19 clause. Finjan became a publicly traded company in June 2013, capitalized with \$30 million. After
20 Finjan’s obligations under the non-compete and confidentiality agreement expired in March 2015,
21 Finjan re-entered the development and production sector of secure mobile products for the consumer
22 market.

FINJAN’S ASSERTED PATENTS

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24 9. On October 12, 2004, U.S. Patent No. 6,804,780 (“the ‘780 Patent”), titled SYSTEM
25 AND METHOD FOR PROTECTING A COMPUTER AND A NETWORK FROM HOSTILE
26 DOWNLOADABLES, was issued to Shlomo Touboul. A true and correct copy of the ‘780 Patent is
27 attached to this Complaint as Exhibit 1 and is incorporated by reference herein.
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1 10. All rights, title, and interest in the ‘780 Patent have been assigned to Finjan, who is the
2 sole owner of the ‘780 Patent. Finjan has been the sole owner of the ‘780 Patent since its issuance.

3 11. The ‘780 Patent is generally directed toward methods and systems for generating a
4 Downloadable ID. By generating an identification for each examined Downloadable, the system may
5 allow for the Downloadable to be recognized without reevaluation. Such recognition increases
6 efficiency while also saving valuable resources, such as memory and computing power.

7 12. On January 12, 2010, U.S. Patent No. 7,647,633 (“the ‘633 Patent”), titled
8 MALICIOUS MOBILE CODE RUNTIME MONITORING SYSTEM AND METHODS, was issued
9 to Yigal Mordechai Edery, Nimrod Itzhak Vered, David R. Kroll, and Shlomo Touboul. A true and
10 correct copy of the ‘633 Patent is attached to this Complaint as Exhibit 2 and is incorporated by
11 reference herein.

12 13. All rights, title, and interest in the ‘633 Patent have been assigned to Finjan, who is the
13 sole owner of the ‘633 Patent. Finjan has been the sole owner of the ‘633 Patent since its issuance.

14 14. The ‘633 Patent is generally directed toward computer networks and, more
15 particularly, provides a system that protects devices connected to the Internet from undesirable
16 operations from web-based content. One of the ways this is accomplished is by determining whether
17 any part of such web-based content can be executed and then trapping such content and neutralizing
18 possible harmful effects using mobile protection code.

19 15. On March 18, 2014, U.S. Patent No. 8,677,494 (“the ‘494 Patent”), titled
20 MALICIOUS MOBILE CODE RUNTIME MONITORING SYSTEM AND METHODS, was issued
21 to Yigal Mordechai Edery, Nimrod Itzhak Vered, David R. Kroll, and Shlomo Touboul. A true and
22 correct copy of the ‘494 Patent is attached to this Complaint as Exhibit 3 and is incorporated by
23 reference herein.

24 16. All rights, title, and interest in the ‘494 Patent have been assigned to Finjan, who is the
25 sole owner of the ‘494 Patent. Finjan has been the sole owner of the ‘494 Patent since its issuance.

26 17. The ‘494 Patent is generally directed toward a method and system for deriving security
27 profiles and storing the security profiles. One of the ways this is accomplished is by deriving a
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1 security profile for a downloadable, which includes a list of suspicious computer operations, and
2 storing the security profile in a database.

3 18. On July 5, 2011, U.S. Patent No. 7,975,305 (“the ‘305 Patent”), titled METHOD AND
4 SYSTEM FOR ADAPTIVE RULE-BASED CONTENT SCANNERS FOR DESKTOP
5 COMPUTERS, was issued to Moshe Rubin, Moshe Matitya, Artem Melnick, Shlomo Touboul,
6 Alexander Yermakov, and Amit Shaked. A true and correct copy of the ‘305 Patent is attached to
7 this Complaint as Exhibit 4 and is incorporated by reference herein.

8 19. All rights, title, and interest in the ‘305 Patent have been assigned to Finjan, who is the
9 sole owner of the ‘305 Patent. Finjan has been the sole owner of the ‘305 Patent since its issuance.

10 20. The ‘305 Patent is generally directed toward network security and, in particular, rule
11 based scanning of web-based content for exploits. One of the ways this is accomplished is by using
12 parser and analyzer rules to describe computer exploits as patterns of types of tokens. Additionally,
13 the system provides a way to keep these rules updated.

14 21. The ‘780 Patent, the ‘633 Patent, the ‘494 Patent, and the ‘305 Patent, as described in
15 paragraphs 9–20 above, are collectively referred to as the “Asserted Patents” herein.

16 **FINJAN’S NOTICE OF INFRINGEMENT TO DEFENDANT**

17 22. Finjan and Defendant’s patent discussions date back to May 2016. Finjan contacted
18 Defendant on or about May 26, 2016, regarding a potential license to Finjan’s patents.

19 23. On or about May 26, 2016, Finjan provided Defendant with an exemplary claim chart
20 detailing how Defendant’s products relate to ‘305 Patent, as well as identifying Defendant’s products
21 that infringe the ‘494 Patent.

22 24. Additionally, based on information and belief, Defendant has studied and reviewed
23 Finjan’s patents, including providing an expert declaration regarding the meaning of Finjan’s patents.
24 In particular, in IPR2018-00136, Zscaler cites, relies, and provided an expert declaration regarding
25 the scope of U.S. Patent No. 6,092,194 (“the ‘194 Patent”). Finjan has been the sole owner of the
26 ‘194 Patent since its issuance. The ‘194 Patent is related to the Asserted Patents. For example, the
27 ‘194 Patent is the parent patent of the ‘780 Patent and contains the same identical specification. The
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1 other Asserted Patents are related to the '194 Patent and incorporate by reference the specification of
2 the '194 Patent. Accordingly, Defendant has had knowledge of the Accused Patents.

3 25. Despite Finjan's earnest and consistent efforts since May 2016, Defendant has refused
4 to take a license to Finjan's patents. At no time has Defendant provided any reasonable
5 explanation—legal or otherwise—as to how any of the Accused Products do not infringe any of the
6 Asserted Patents.

7 **Zscaler**

8 26. Defendant makes, uses, sells, offers for sale, and/or imports into the United States and
9 this District products and services that utilize the Zscaler's Internet Access Bundles (including
10 Professional, Business, and Transformation), Private Access Bundle (including Professional
11 Business, and Enterprise), Zscaler Enforcement Node ("ZEN"), Secure Web Gateway, Cloud
12 Firewall, Cloud Sandbox, and Cloud Architecture products, services, and technologies. *See*
13 <https://www.zscaler.com/resources/solution-briefs/zscaler-internet-access.pdf>,
14 <https://www.zscaler.com/products/zscaler-private-access>, [https://help.zscaler.com/zia/about-zscaler-](https://help.zscaler.com/zia/about-zscaler-cloud-architecture)
15 [cloud-architecture](https://help.zscaler.com/zia/about-zscaler-cloud-architecture), <https://www.zscaler.com/resources/solution-briefs/swg-web-security.pdf>,
16 <https://www.zscaler.com/resources/solution-briefs/next-generation-cloud-firewall.pdf>,
17 <https://www.zscaler.com/resources/solution-briefs/zscaler-cloud-sandbox.pdf>,
18 <https://www.zscaler.com/products/cloud-architecture>, attached hereto as Exhibits 5–11.

19 **Zscaler Internet Access**

20 27. Defendant's Internet Access Bundles (sometimes referred as Zscaler Web Security
21 Suite) provide access to the Zscaler's Cloud Security Platform and Services, including Data Centers
22 (which acts as a Secure Web Gateway/proxy servers), Standard and Advanced Sandboxes (for static
23 and dynamic analysis to create security profiles and store them in databases), and Advanced Threat
24 Protection (also for static and dynamic analysis to create security profiles and store them in
25 databases). This is shown in Zscaler document shown below.
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ZSCALER INTERNET ACCESS SERVICE	PROFESSIONAL	BUSINESS	TRANSFORMATION
CLOUD SECURITY PLATFORM			
Data Centers Global access, high availability, with latency SLAs	✓	✓	✓
Traffic Forwarding GRE tunnel, IPsec, proxy chaining, PAC file, or Mobile Zscaler App	✓	✓	✓
Authentication SAML, secure LDAP, Kerberos, hosted	✓	✓	✓
Real-Time Cloud Security Updates Receive full cloud threat sharing (cloud effect), daily security updates (over 120,000/day) and 40+ security feeds	✓	✓	✓
Real-Time Reporting and Logging Report on web transactions anywhere in seconds. Select geography of choice for all log storage (US or EU).	✓	✓	✓
SSL Inspection Full inline threat inspection of all SSL traffic with SLA. Granular policy control for content exclusion	Add-on	✓	✓
Nanolog Streaming Service Transmit logs from all users and locations to an on-premise SIEM in real time	Add-on	✓	✓
CLOUD SECURITY SERVICES			
URL and Content Filtering Granular policy by user, group, location, time, and quota; dynamic content classification for unknown URLs and Safe Search	✓	✓	✓
File Type Control True file type control by user, location, and destination	✓	✓	✓
Inline Antivirus & Antispyware Signature based antimalware and full inbound/outbound file inspection	✓	✓	✓
Reputation-Based Threat Protection Stop known botnets, command-and-control communications, and phishing	✓	✓	✓
Standard Cloud Firewall Granular outbound rules by IP address, port, and protocol (5-tuple rules)	✓	✓	✓
Advanced Cloud Firewall Full outbound next-gen cloud firewall with application and user awareness and location control; full logging and reporting	Add-on	Add-on	✓
Bandwidth Control Ensure business apps like Office 365 are prioritized over recreational traffic	Add-on	✓	✓
Standard Cloud Sandbox Zero-day protection for .exe and .dll files from unknown and suspicious sites	✓	✓	✓
Advanced Cloud Sandbox Zero-day protection for all file types from all sites; ability to hold file delivery until confirmed sandbox clean; advanced reporting	Add-on	Add-on	✓
Advanced Threat Protection PageRisk and content analysis of malware, callbacks, cross-site scripting, cookie stealing, and anonymizers	Add-on	✓	✓
Cloud Application Visibility & Control Discover, monitor, and control access to web applications	Add-on	✓	✓
Mobile Application Reporting & Control			

Ex. 5 at 5 (available at <https://www.zscaler.com/resources/solution-briefs/zscaler-internet-access.pdf>).

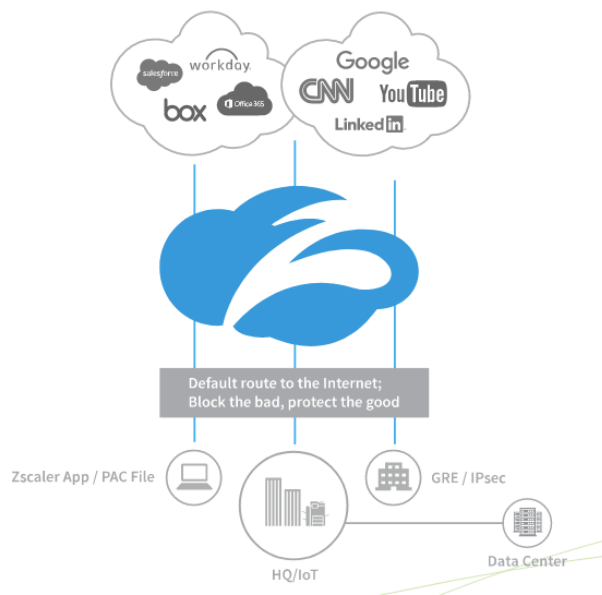
28. As shown below, Zscaler’s Internet Access/ Cloud Security Services provides content inspection inline.

Zscaler Internet Access: fast, secure access to the Internet and SaaS apps

Enabling secure network transformation

Zscaler provides all users, everywhere, with identical protection:

- Full inline content inspection
- Native SSL inspection Cloud intelligence
- Real-time threat correlation
- 60+ industry threat feeds
- Global visibility
- Policies follows the user



See <https://www.zscaler.com/resources/ebooks/zscaler-cloud-security-platform>.

29. As shown below, Zscaler’s Data Centers (*i.e.*, Secure Web Gateways) are located in the U.S.

Born in the cloud, globally distributed

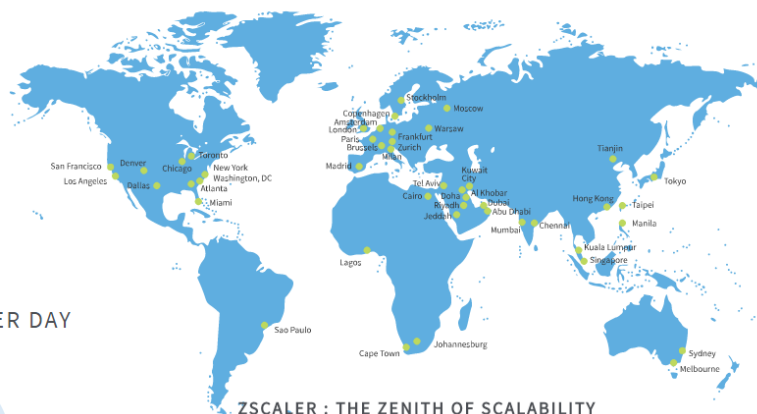
Zscaler and its engineering team have been granted scores of patents for architectural innovations.

100 DATA CENTERS

5 CONTINENTS

40 BILLION REQUESTS PER DAY

120,000+ UNIQUE SECURITY UPDATES PER DAY



ZSCALER : THE ZENITH OF SCALABILITY



USERS PROTECTED
1.6 MILLION



TRAFFIC SECURED
190 COUNTRIES



BANDWIDTH USAGE
53 Gbps



OFFICE 365 TRAFFIC
83TB per MONTH

See <https://www.zscaler.com/resources/ebooks/zscaler-cloud-security-platform>.

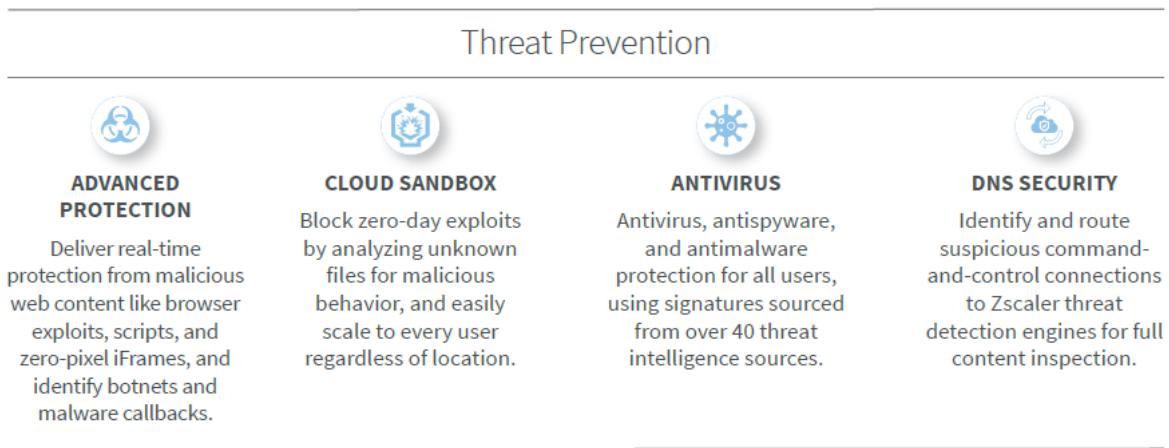
30. Zscaler’s Data Centers are also known as Zscaler Enforcement Nodes (“ZENS”) and provide inline security gateways that inspect all Internet for malware as shown below.

Zscaler Enforcement Nodes

Zscaler Enforcement Nodes (ZENS) are full-featured, inline Internet security gateways that inspect all Internet traffic bi-directionally for malware, and enforce security and compliance policies. An organization can forward its traffic to any ZEN in the world or use the advanced geo-IP resolution capability of Zscaler to direct its users’ traffic to the nearest ZEN. When the user moves to a different location, the policy follows the user, with the ZEN downloading the appropriate policy. Each ZEN can handle hundreds of thousands of concurrent users with millions of concurrent sessions. With the exception of sandboxing, all inspection engines run within the ZEN. Customer traffic is not passed to any other component within the Zscaler infrastructure. The TCP stack on the ZEN runs in user mode, and is specially crafted to ensure multitenancy and data security. ZENS never store any data to disk. Packet data is held in memory for inspection and then, based on policy, is either forwarded or dropped. Log data generated for every transaction is compressed, tokenized, and exported over secure TLS connections to Log Routers that direct the logs to the Nanolog cluster, hosted in the appropriate geographical region, for each organization. ZENS are always deployed in active-active load balancing mode all over the world, and the CA monitors the health of ZENS to ensure availability.

Ex. 7 at 1 (available at <https://help.zscaler.com/zia/about-zscaler-cloud-architecture>).

31. Zscaler sells access as subscriptions to customers to its Internet Access/Cloud Security Services under different levels of services (e.g., Professional, Business, and Transformation) and as Add-on services. As shown below, Zscaler’s Cloud Sandbox and Advanced Threat Protection perform dynamic and static analysis of content to prevent zero-day exploits.



Ex. 5 at 3 (available at <https://www.zscaler.com/resources/solution-briefs/zscaler-internet-access.pdf>).

32. As shown below, Zscaler’s Cloud Sandbox derives security profile data identifying suspicious operations.

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Zscaler's cloud-based sandboxes assess a file's risk level based on multiple factors

Gain a complete picture of what is happening in the sandboxes in real time.

Threat Score

Malicious 100

Delaying code execution to avoid sandbox detection

Stealing user credentials

Opening ports to allow remote connectivity

Downloading additional malware

Suspicious operations

15 See <https://www.zscaler.com/resources/ebooks/zscaler-cloud-sandbox> (emphasis added).

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Malware Severity

Attempts evasion

Callback behavior

Details of files dropped

Analysis screenshot

Ex. 10 at 3 (available at <https://www.zscaler.com/resources/solution-briefs/zscaler-cloud-sandbox.pdf>).

Zscaler Private Access

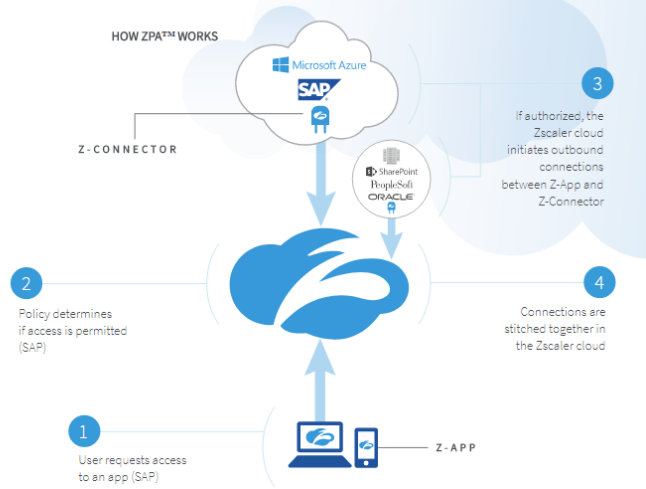
33. Defendant’s Private Access is also a cloud-based service that is similar to the Zscaler Internet Access/ Cloud Security Services described above. As shown below, the Zscaler Private Access provides access to Zscaler’s technologies.

Zscaler Private Access : fast, secure access to internal apps

A new approach that enables secure application access transformation

WITH ZSCALER PRIVATE ACCESS

- Users are never on the corporate network
- Apps are invisible, never exposed to the Internet
- The Internet becomes a secure network without a VPN
- You can segment apps without network segmentation
- Internal apps can easily be moved to Azure or AWS



See <https://www.zscaler.com/resources/ebooks/zscaler-cloud-security-platform>.

Zscaler Platform

34. Defendant’s Platform (also known as Cloud Architecture) is also a cloud-based service that is similar to the Zscaler Internet Access/ Cloud Security Services described above. As shown below, the Zscaler Platform services also integrates to Zscaler’s Cloud Sandbox and Advanced Protection.



1 See <https://www.zscaler.com/resources/ebooks/zscaler-cloud-security-platform>.

2 **ZSCALER'S INFRINGEMENT OF FINJAN'S PATENTS**

3 35. Defendant has been and is now infringing, and will continue to infringe, the '780
4 Patent, the '633 Patent, the '494 Patent, and the '305 Patent (collectively, the "Asserted Patents") in
5 this Judicial District and elsewhere in the United States by, among other things, making, using,
6 importing, selling, and/or offering for sale the Zscaler's Internet Access Bundles (including
7 Professional, Business, and Transformation), Private Access Bundle (including Professional
8 Business, and Enterprise), Zscaler Enforcement Node ("ZEN"), Secure Web Gateway, Cloud
9 Firewall, Cloud Sandbox, and Cloud Architecture products and services ("Accused Products").

10 36. In addition to directly infringing the Asserted Patents pursuant to 35 U.S.C. § 271(a),
11 either literally or under the doctrine of equivalents, or both, Defendant indirectly infringes all the
12 Asserted Patents by instructing, directing, and/or requiring others, including its customers,
13 purchasers, users, and developers, to perform all or some of the steps of the method claims, either
14 literally or under the doctrine of equivalents, or both, of the Asserted Patents.

15 **COUNT I**

16 **(Direct Infringement of the '780 Patent pursuant to 35 U.S.C. § 271(a))**

17 37. Finjan repeats, realleges, and incorporates by reference, as if fully set forth herein, the
18 allegations of the preceding paragraphs, as set forth above.

19 38. Defendant has infringed Claims 1-18 of the '780 Patent in violation of 35 U.S.C.
20 § 271(a).

21 39. Defendant's infringement is based upon literal infringement or infringement under the
22 doctrine of equivalents, or both.

23 40. Defendant's acts of making, using, importing, selling, and/or offering for sale
24 infringing products and services have been without the permission, consent, authorization, or license
25 of Finjan.

26 41. Defendant's infringement includes, but is not limited to, the manufacture, use, sale,
27 importation and/or offer for sale of Defendant's products and services, including its Internet Access
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1 Bundles (including Professional, Business, and Transformation), Private Access Bundle (including
2 Professional Business, and Enterprise), ZEN, Secure Web Gateway, Cloud Firewall, Cloud Sandbox,
3 and Cloud Architecture products and services (collectively, the “‘780 Accused Products”).

4 42. The ‘780 Accused Products embody the patented invention of the ‘780 Patent and
5 infringe the ‘780 Patent because they practice a method of obtaining a downloadable that includes
6 one or more references to software components required to be executed by the downloadable,
7 fetching at least one software component required to be executed by the downloadable, and
8 performing a hashing function on the downloadable and the fetched software components to generate
9 a Downloadable ID. For example, as shown below, the ‘780 Accused Products provide gateway
10 security to end users, where they receive downloadables that include one or more references to
11 executable software components, including .exe files, .pdf files, and other downloadables that might
12 exhibit malicious behavior. The ‘780 Accused Products will also fetch at least one software
13 component required to be executed by the downloadable.

Detailed Forensic Analysis of Zero-Day Malware

Zscaler Behavioral Analysis Reports provide a comprehensive analysis of the malicious behavior observed during execution of zero-day malware in our sandbox. Zscaler automatically blocks malware identified via Behavioral Analysis, maintaining a real time blacklist that prevents all users in our network from downloading malicious files.

Overall classification of the file analyzed: **Malicious** (Score: 100)

Is the file a known piece of malware? **Classification: Malicious**

What kind of network traffic behavior does the file exhibit? **Networking: Opens a port and listens for incoming connection**

What kind of stealth or obfuscation behavior does the file exhibit? **Stealth: Hides files or obscures query functions; Modifies Windows Explorer zone settings; Hides the priority of usermode functions; Copies Internet Explorer cookies; No registry**

Does the file leak or gather data? **Information Leakage: Hides clipboard functions; Hides application functions; Hides IP address**

Does the file try to bypass OS security? **Security System: Creates a thread in another existing process; Enables security privileges; Injects a file into a foreign process; Modifies the content of a thread in another process**

Does the file try to gain wider access to the system or spread to other devices and computers? **Spreading: Shows file indicator / information gathering behavior; Quotes a list of all running processes**

What actions does the file take? **Permissions: Creates an activation registry key; Copies file contents**

DownloadableID: MD5: 6806a1bcc2b6385ff28e9eaa085ba883

Zscaler Cloud Sandbox generates Downloadable ID to identify a Downloadable.

Ex. 12 at 5 (zscaler-apt-datasheet.pdf) (emphasis added).

43. The ‘780 Accused Products perform a hashing function (such as MD-5, SHA1, or SHA256) on the downloadable to generate a downloadable ID, as shown above and below. The ‘780 Accused Products hash files and components that are referenced by the downloadable as part of creating a downloadable ID, such as dropped files.

Detailed Forensic Analysis of Zero-Day Malware

Zscaler Behavioral Analysis Reports provide a comprehensive analysis of the malicious behavior observed during execution of zero-day malware in our sandbox. Zscaler automatically blocks malware identified via Behavioral Analysis, maintaining a real time blacklist that prevents all users in our network from downloading malicious files.

The screenshot displays a Zscaler Behavioral Analysis Report. The 'File Properties' section is highlighted with a green box and contains the following information:

- Vendor:** BA_REPORT_STATIC_FILE_INFO_FILE_NOT_SIGNED
- File Size:** 991,149 bytes
- MD5:** 6806a1bcc2b6385ff28e9eaa05ba883
- SHA1:** a0e79ea64747dd1c35fd5c3f1f2e38ddd11994c
- SSDEEP:** 24576:8RmJkcoQricOIQxiZY1iaYQEGczQYtaRbFem:pJZoQrbTFZY1iaYgwvm

A green box labeled 'DownloadableID' points to the MD5 hash. A dashed green box labeled 'What files are left behind after file execution?' points to the 'Dropped Files' section, which lists:

- Original file: 1 KB
- Dropped files: 1 KB
- Packet capture: 2 KB

Other sections include 'System Summary' and 'File Properties' with detailed static information about the file.

Zscaler Cloud Sandbox generates Downloadable ID to identify a Downloadable.

Ex. 12 at 5 (zscaler-apt-datasheet.pdf) (emphasis added).

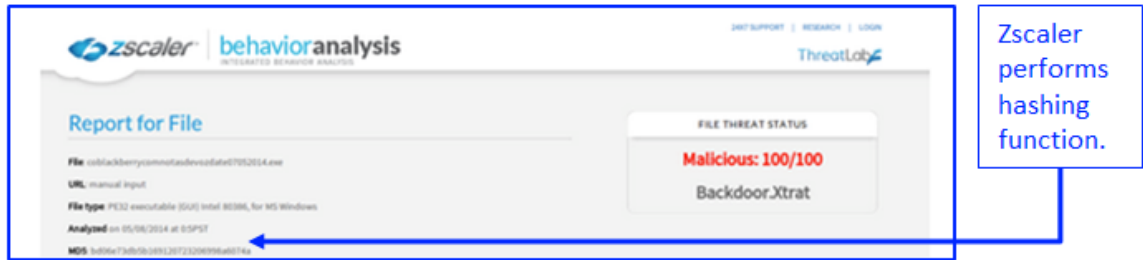
Dropped Files

- C:\Documents and Settings\user\AppData\Local\Gywyx\bose.yce
- C:\WINDOWS\system32\wbem\Logs\wbemprox.log
- C:\Documents and Settings\user\AppData\Local\Microsoft\Address Book\user.wab-
- C:\DOCUMENTS-1\user\LOCALS-1\Temp\tmp9fa87ca3.bat
- C:\DOCUMENTS-1\user\LOCALS-1\Temp\WPS2.tmp
- C:\Documents and Settings\user\AppData\Local\Microsoft\Address Book\user.wab

Zscaler Cloud Sandbox obtains Downloadable that includes one or more references to software components.

Ex. 12 at 5 (zscaler-apt-datasheet.pdf) (emphasis added).

Zscaler behavioral analysis report:



Screen capture of the Zscaler Behavioral Analysis report for Backdoor.Xtrat

Typical behavior of this backdoor:

- Injects itself into *svchost.exe*, *exploere.exe* and *iexplore.exe*
- Drops PE files
- Performs network activity to accept commands from a remote server and sends data to the remote server

Dropped file details:

The backdoor drops the following two EXE files on victim's machine. Both of the EXE files are same, but are dropped with different names.

- *vbc.exe/wintegfire.exe*
 - md5 : 6fb9ce258a2420d898b6d0fa4d73bb8f
 - VT Report : 6/52 (Also very less detection)

Network Activity:

The backdoor downloads content from 'analaloca.chickenkiller.com' over port 3460.

- URL: *hxxp://analaloca[.]chickenkiller[.]com:3460/123456.functions*
- IP: 181[.]135[.]149[.]40
- Zulu report: 100/100

Zscaler fetches at least one software component.

Ex. 13 at 2–3 (available at <https://www.zscaler.com/blogs/research/backdoor-xtrat-continues-evade-detection>) (emphasis added).

44. Defendant’s infringement of the ‘780 Patent has injured Finjan in an amount to be proven at trial.

45. Defendant has been long-aware of Finjan’s patents, including the ‘780 Patent, and has acted recklessly and egregiously with conduct that is willful, wanton, malicious, bad-faith, deliberate, wrongful, and flagrant by its continued infringing activity despite this possessing specific knowledge of the accused infringement. On or about May 26, 2016, Finjan informed Defendant of its patent portfolio, including Defendant’s infringement thereof. Defendant also has direct knowledge of the ‘194 Patent, which shares the same specification and is related to the ‘780 Patent.

1 46. On information and belief, despite its knowledge of the ‘780 Patent, Defendant has
2 made no effort to design its products or services around the ‘780 Patent in order to avoid
3 infringement. Instead, on information and belief, Defendant incorporated infringing technology into
4 additional products, such as those identified in this Complaint. All of these actions demonstrate
5 Defendant’s blatant and egregious disregard for Finjan’s patent rights.

6 47. Despite its knowledge of Finjan’s patent portfolio and Asserted Patents, being
7 provided a representative claim chart of Finjan patents, Defendant has sold and continues to sell the
8 accused products and services in complete and reckless disregard of Finjan’s patent rights. As such,
9 Defendant has acted recklessly and continues to willfully, wantonly, and deliberately engage in acts
10 of infringement of the ‘780 Patent, justifying an award to Finjan of increased damages under 35
11 U.S.C. § 284, and attorneys’ fees and costs incurred under 35 U.S.C. § 285.

COUNT II

(Indirect Infringement of the ‘780 Patent pursuant to 35 U.S.C. § 271(b))

12
13
14 48. Finjan repeats, realleges, and incorporates by reference, as if fully set forth herein, the
15 allegations of the preceding paragraphs, as set forth above.

16 49. Defendant has induced infringement of at least Claims 1-8 of the ‘780 Patent under 35
17 U.S.C. § 271(b).

18 50. In addition to directly infringing the ‘780 Patent, Defendant indirectly infringes the
19 ‘780 Patent pursuant to 35 U.S.C. § 271(b) by instructing, directing and/or requiring others, including
20 customers, purchasers, users and developers, to perform some of the steps of the method claims,
21 either literally or under the doctrine of equivalents, of the ‘780 Patent, where all the steps of the
22 method claims are performed by either Defendant or its customers, purchasers, users and developers,
23 or some combination thereof. Defendant knew or was willfully blind to the fact that it was inducing
24 others, including customers, purchasers, users and developers, to infringe by practicing, either
25 themselves or in conjunction with Defendant, one or more method claims of the ‘780 Patent,
26 including Claims 1-8.
27
28

1 Professional Business, and Enterprise), ZEN, Secure Web Gateway, Cloud Firewall, Cloud Sandbox,
2 and Cloud Architecture products and services (collectively, the “‘633 Accused Products”).

3 58. The ‘633 Accused Products embody the patented invention of the ‘633 Patent and
4 infringe the ‘633 Patent because they practice a method and a system of receiving downloadable
5 information, determining whether that the downloadable information includes executable code, and
6 transmitting mobile protection code to at least one information destination of the downloadable
7 information if the downloadable information is determined to include executable code. For example,
8 as shown below, the ‘633 Accused Products provide gateway security to end users, where they
9 receive downloadable information and scan this downloadable information to determine whether it
10 contains executable code. If the downloadable information includes executable code, mobile
11 protection code and the executable code are sent to an information destination, such as the Zscaler
12 Cloud Sandbox for processing within a sandbox.

13 59. The Zscaler Cloud Security Services will analyze executable code and create
14 executable mobile protection code used within the virtual machine or sandbox described below. For
15 example, the Zscaler Cloud Security Services will determine whether a downloadable includes
16 executable code such as JavaScript.

17 **About Advanced Threats Protection**

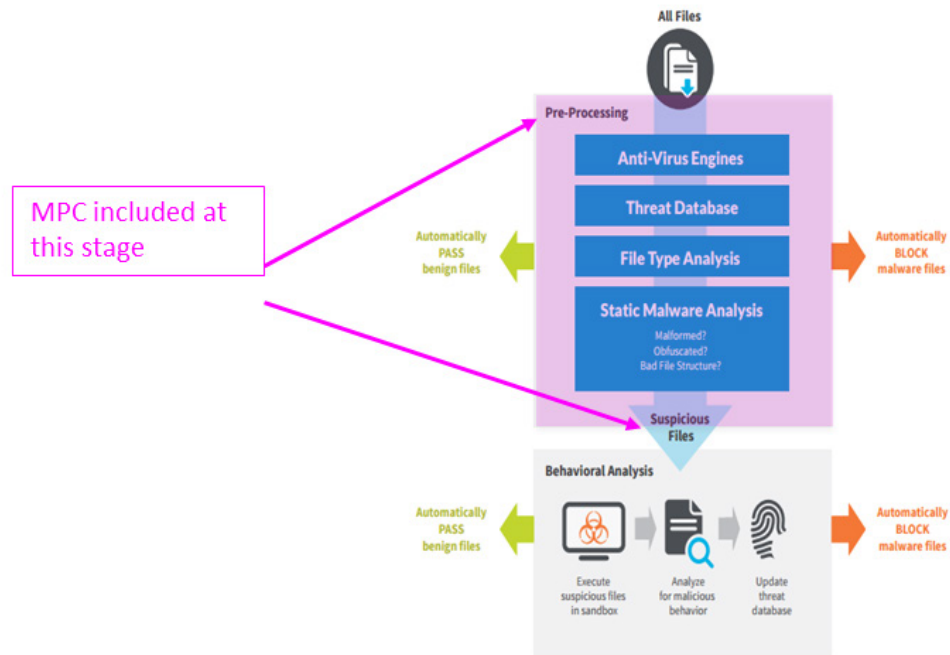
18 Today, web pages do not just contain plain text nested inside HTML tags. Instead, they are filled with Java
19 applets, flash videos, ActiveX and other objects designed to run programs. Hackers routinely embed
20 malicious scripts and applications not only on their own web sites but on legitimate websites that they
21 have hacked as well. The Zscaler service identifies a variety of these objects and scripts and prevents
22 them from downloading to the end user's browser.

23 When you configure the Advanced Threats Protection policy, you can set a Suspicious Content Protection
24 (Page Risk™) value. The Zscaler service calculates the Risk Index of a page in real-time by identifying
25 malicious content within the page (injected scripts, vulnerable ActiveX, zero-pixel iFrames, and many
26 more) and creating a risk score, or Page Risk Index. Simultaneously, a Domain Risk Index is created using
27 data such as hosting country, domain age, past results, and links to high-risk top-level domains. The Page
28 Risk and Domain Risk are combined to produce a single score for the Risk Index; this score is then
evaluated against the Suspicious Content Protection (Page Risk™) value that you set in this policy.

The Advanced Threats Protection policy also protects your traffic against the following advanced threats:

Ex. 16 at 1 (available at <https://support.zscaler.com/hc/en-us/articles/204971595-How-do-I-configure-the-Advanced-Threats-Protection-policy->) (emphasis added).

60. The Accused Products infringe the ‘633 Patent because these products and services receive downloadable information, determine whether it contains executable code, and transmit mobile protection code to at least one information destination (e.g., Zscaler Cloud Sandbox) if the downloadable has executable code as shown below.



Ex. 12 at 2 (zscaler-apt-datasheet.pdf) (emphasis added).

61. As a result of Defendant’s unlawful activities, Finjan has suffered and will continue to suffer irreparable harm for which there is no adequate remedy at law. Finjan and Defendant both compete in the security software space and Finjan is actively engaged in licensing its patent portfolio, as described for example in paragraphs 8-9 above. Defendant’s continued infringement of the Asserted Patents causes harm to Finjan in the form of price erosion, loss of goodwill, damage to reputation, loss of business opportunities, inadequacy of money damages, and direct and indirect competition. Monetary damages are insufficient to compensate Finjan for these harms. Accordingly, Finjan is entitled to preliminary and/or permanent injunctive relief.

1 73. Defendant’s infringement is based upon literal infringement or, in the alternative,
2 infringement under the doctrine of equivalents.

3 74. Defendant acts of making, using, importing, selling, and/or offering for sale infringing
4 products and services have been without the permission, consent, authorization or license of Finjan.

5 75. Defendant’s infringement includes, but is not limited to, the manufacture, use, sale,
6 importation and/or offer for sale of Defendant’s products and services, including its Internet Access
7 Bundles (including Professional, Business, and Transformation), Private Access Bundle (including
8 Professional Business, and Enterprise), ZEN, Secure Web Gateway, Cloud Firewall, Cloud Sandbox,
9 and Cloud Architecture products and services (collectively, the “‘494 Accused Products”).

10 76. The ‘494 Accused Products embody the patented invention of the ‘494 Patent and
11 infringe the ‘494 Patent because they practice a computer-based method comprised of receiving an
12 incoming downloadable, deriving security profile data for the downloadable, including a list of
13 suspicious computer operations that may be attempted by the downloadable, and storing the
14 downloadable security profile data in a database. For example, as shown below, the ‘494 Accused
15 Products provide gateway security to end users, where incoming downloadables are received by the
16 ‘494 Accused Products. For example, Zscaler’s Cloud Sandbox derives security profile data for the
17 downloadable, which includes a list of suspicious computer operations that may be attempted by the
18 downloadable. As shown below, Zscaler’s products and services receiving incoming downloadables
19 such as JavaScript and Java.

- Choose the **File Types** to which the rule applies. The file types you can select for your Behavioral Analysis policy are:

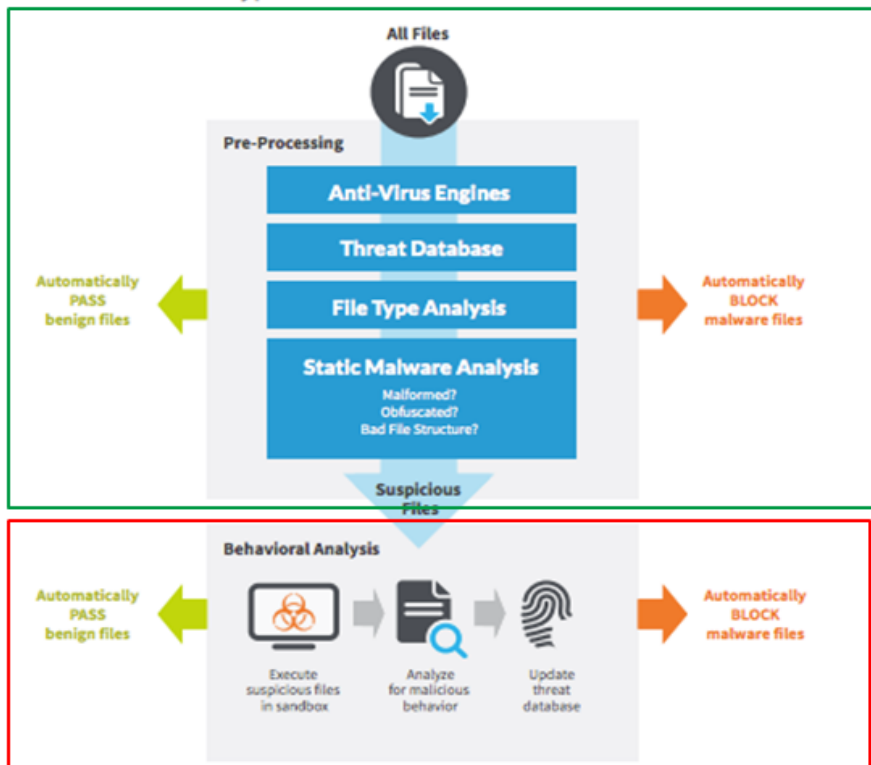
- **Archive**
 - RAR Files (rar)
 - ZIP (zip)
- **Executable**
 - Windows Executables (exe, exe64)
 - Windows Library (dll64, dll, ocx, sys, scr)
- **Microsoft Office**
 - Microsoft Excel (xls)
 - Microsoft PowerPoint (pptx, ppt)
 - Microsoft Word (docx, doc)
- **Mobile**
 - Android Application Package (apk)
- **Other**
 - PDF Documents (pdf)
- **Web Content**
 - Adobe Flash
 - Java Applet (jar, class)

Zscaler receives incoming downloadable



Ex. 17 at 2-3 (<https://zscaler-alt.zendesk.com/hc/en-us/articles/216295668-How-do-I-configure-the-Behavioral-Analysis-policy->) (emphasis added).

77. As shown below, Zscaler’s Cloud Sandbox performs static and dynamic analyses on the downloadable and then stores the downloadable security profile data in databases (such as the Zscaler “threat database”) and provides reports of that data.



Ex. 12 at 2 (zscaler-apt-datasheet.pdf) (emphasis added).

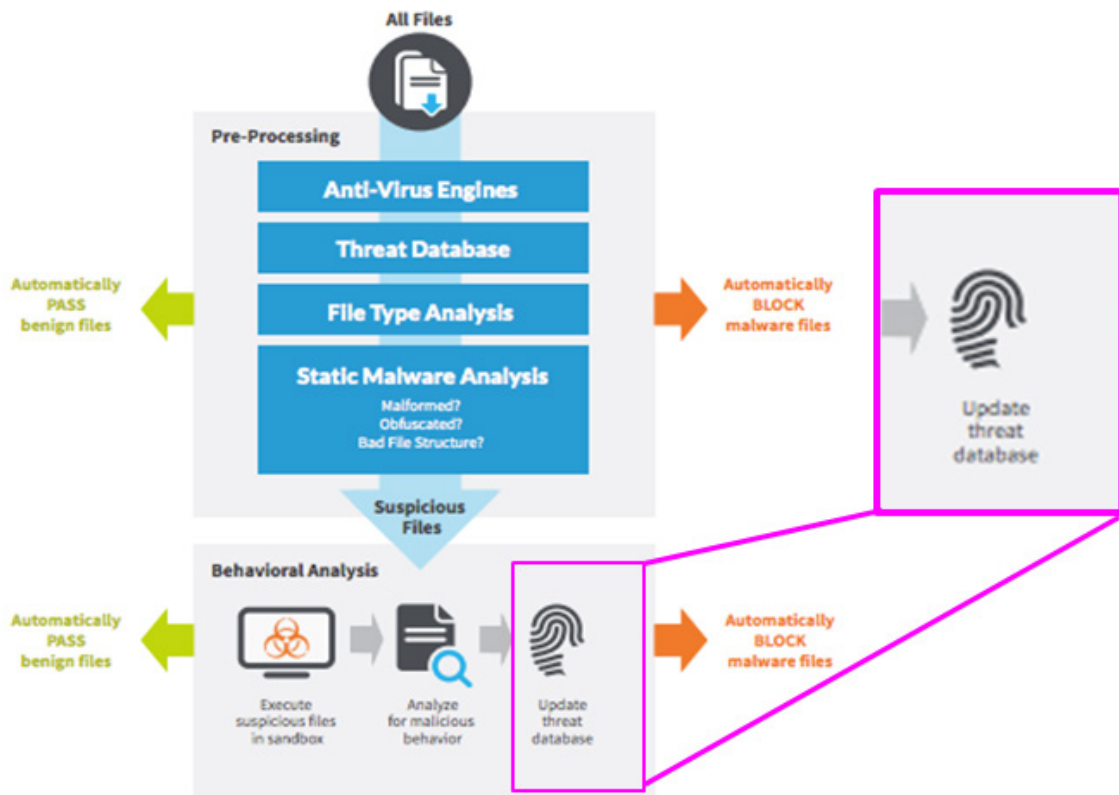
78. As shown below, Zscaler’s Cloud Sandbox derives security profile data identifying suspicious operations and storing them in a database.

Zscaler's cloud-based sandboxes assess a file's risk level based on multiple factors

Gain a complete picture of what is happening in the sandboxes in real time.

See <https://www.zscaler.com/resources/ebooks/zscaler-cloud-sandbox> (emphasis added).

Ex. 10 at 3 (available at <https://www.zscaler.com/resources/solution-briefs/zscaler-cloud-sandbox.pdf>).



Ex. 12 at 2 (zscaler-apt-datasheet.pdf) (emphasis added).

79. Defendant’s infringement of the ‘494 Patent has injured Finjan in an amount to be proven at trial.

80. Defendant has been long-aware of Finjan’s patents, including the ‘494 Patent, and has acted recklessly and egregiously with conduct that is willful, wanton, malicious, bad-faith, deliberate, wrongful, and flagrant by its continued infringing activity despite this possessing specific knowledge of the accused infringement. On or about May 26, 2016, Finjan informed Defendant of its patent portfolio, including the Asserted Patents and Defendant’s infringement thereof. Defendant also has direct knowledge of the ‘194 Patent, which is incorporated by reference by and is related to the ‘494 Patent.

81. On information and belief, despite its knowledge of the ‘494 Patent, Defendant has made no effort to design its products or services around Finjan’s ‘494 Patent, in order to avoid

1 infringement. Instead, on information and belief Defendant incorporated infringing technology into
2 additional products, such as those identified in this Complaint. All of these actions demonstrate
3 Defendant's blatant and egregious disregard for Finjan's patent rights.

4 82. Despite its knowledge of Finjan's patent portfolio and Asserted Patents, and being
5 provided a representative claim chart of Finjan patents, Defendant has sold and continues to sell the
6 accused products and services in complete and reckless disregard of Finjan's patent rights. As such,
7 Defendant has acted recklessly and continues to willfully, wantonly, and deliberately engage in acts
8 of infringement of the '494 Patent, justifying an award to Finjan of increased damages under 35
9 U.S.C. § 284, and attorneys' fees and costs incurred under 35 U.S.C. § 285.

10 **COUNT VI**

11 **(Indirect Infringement of the '494 Patent pursuant to 35 U.S.C. § 271(b))**

12 83. Finjan repeats, realleges, and incorporates by reference, as if fully set forth herein, the
13 allegations of the preceding paragraphs, as set forth above.

14 84. Defendant has induced infringement of at least Claims 3-5 and 7-9 of the '494 Patent
15 under 35 U.S.C. § 271(b).

16 85. In addition to directly infringing the '494 Patent, Defendant indirectly infringes the
17 '494 Patent pursuant to 35 U.S.C. § 271(b) by instructing, directing and/or requiring others, including
18 customers, purchasers, users and developers, to perform one or more of the steps of the method
19 claims, either literally or under the doctrine of equivalents, of the '494 Patent, where all the steps of
20 the method claims are performed by either Defendant, its customers, purchasers, users, and
21 developers, or some combination thereof. Defendant knew or was willfully blind to the fact that it
22 was inducing others, including customers, purchasers, users, and developers, to infringe by
23 practicing, either themselves or in conjunction with Defendant, one or more method claims of the
24 '494 Patent, including Claims 3-5 and 7-9.

25 86. Defendant knowingly and actively aided and abetted the direct infringement of the
26 '494 Patent by instructing and encouraging its customers, purchasers, users, and developers to use the
27 '494 Accused Products. Such instruction and encouragement includes, but is not limited to, advising
28

1 third parties to use the ‘494 Accused Products in an infringing manner, providing a mechanism
2 through which third parties may infringe the ‘494 Patent, advertising and promoting the use of the
3 ‘494 Accused Products in an infringing manner, and distributing guidelines and instructions to third
4 parties on how to use the ‘494 Accused Products in an infringing manner.

5 87. Defendant updates and maintains an HTTP site with Defendant’s quick start guides,
6 administration guides, user guides, operating instructions, and training and certifications which cover
7 in depth aspects of operating Defendant’s offerings. *See, e.g.*, <https://help.zscaler.com/zia> and
8 [https://www.zscaler.com/resources/training-certification-](https://www.zscaler.com/resources/training-certification-overview?_ga=2.110592453.1966009248.1511983057-74035905.1511983057)
9 [overview?_ga=2.110592453.1966009248.1511983057-74035905.1511983057](https://www.zscaler.com/resources/training-certification-overview?_ga=2.110592453.1966009248.1511983057-74035905.1511983057), attached hereto as
10 Exhibits 14–15.

11 **COUNT VII**

12 **(Direct Infringement of the ‘305 Patent pursuant to 35 U.S.C. § 271(a))**

13 88. Finjan repeats, realleges, and incorporates by reference, as if fully set forth herein, the
14 allegations of the preceding paragraphs, as set forth above.

15 89. Defendant has infringed and continues to infringe Claims 1-25 of the ‘305 Patent in
16 violation of 35 U.S.C. § 271(a).

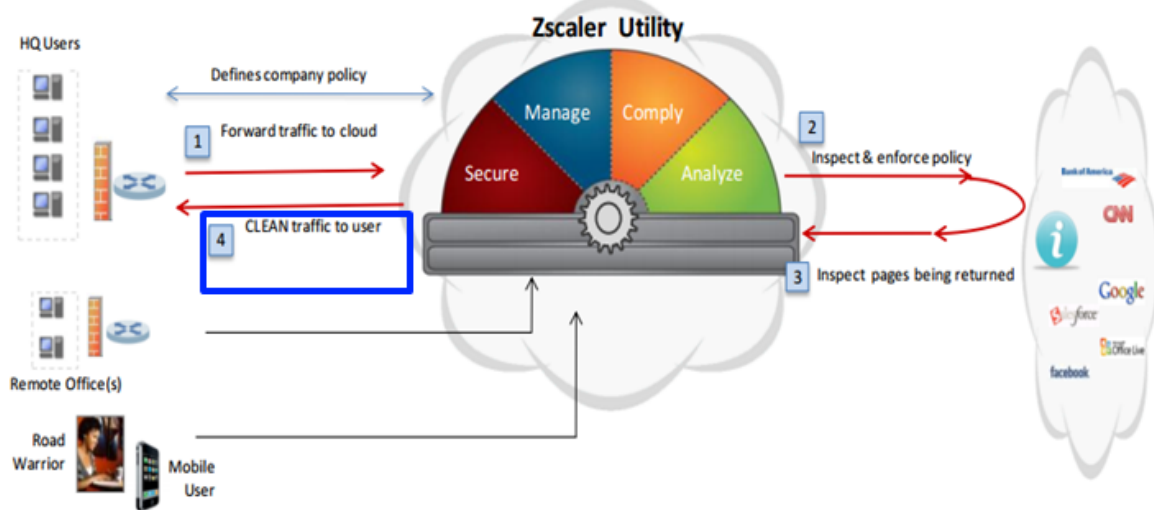
17 90. Defendant’s infringement is based upon literal infringement or, in the alternative,
18 infringement under the doctrine of equivalents.

19 91. Defendant acts of making, using, importing, selling, and/or offering for sale infringing
20 products and services have been without the permission, consent, authorization or license of Finjan.

21 92. Defendant’s infringement includes, but is not limited to, the manufacture, use, sale,
22 importation and/or offer for sale of its products and services, including Zscaler’s Internet Access
23 Bundles (including Professional, Business, and Transformation), Private Access Bundle (including
24 Professional Business, and Enterprise), ZEN, Secure Web Gateway, Cloud Firewall, Cloud Sandbox,
25 and Cloud Architecture products and services (collectively, the “‘305 Accused Products”).

26 93. The ‘305 Accused Products embody the patented invention of the ‘305 Patent and
27 infringe the ‘305 Patent because they practice a method of receiving incoming content from the
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Internet, selectively diverting content from its intended destination, scanning the content to recognize potential computer exploits using analyzer and parser rules, and updating those rules to incorporate new behavioral rules. For example, as shown below, the ‘305 Accused Products provide gateway security to end users, where incoming internet content is received by the ‘305 Accused Products.



WHAT SETS ZSCALER APART?

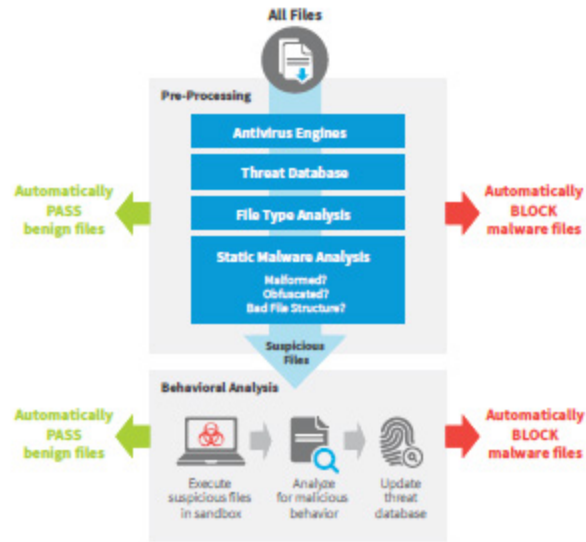
Zscaler sits between users and the Internet to make sure nothing bad comes in nothing good leaks out. Every byte of traffic is inspected to guard against cyberattacks, prevent data exfiltration, and enforce policies.

With Zscaler, there is no hardware or software to purchase and manage. Simply point your Internet-bound traffic to the closest Zscaler data center, and it instantly begins enforcing policies and blocking threats inline. You'll instantly benefit from:

Zscaler receives incoming content from the Internet on its destination to an Internet application.

Ex. 18 at 3 (ds_functionality_technical_overview.pdf) (emphasis added).

94. The ‘305 Accused Products selectively divert content from its intended destination, scanning it to recognize potential computer exploits using analyzer and parser rules, and sending the content to the Zscaler Cloud Sandbox.



Ex. 10 at 2 (available at <https://www.zscaler.com/resources/solution-briefs/zscaler-cloud-sandbox.pdf>).

95. As a result of Defendant's unlawful activities, Finjan has suffered and will continue to suffer irreparable harm for which there is no adequate remedy at law. Finjan and Defendant both compete in the security software space and Finjan is actively engaged in licensing its patent portfolio, as described for example in paragraphs 8-9 above. Defendant's continued infringement of the Asserted Patents, including the '305 Patent, causes harm to Finjan in the form of price erosion, loss of goodwill, damage to reputation, loss of business opportunities, inadequacy of money damages, and direct and indirect competition. Monetary damages are insufficient to compensate Finjan for these harms. Accordingly, Finjan is entitled to preliminary and/or permanent injunctive relief.

96. Defendant's infringement of the '305 Patent has injured and continues to injure Finjan in an amount to be proven at trial.

97. Defendant has been long-aware of Finjan's patents, including the '305 Patent, and has acted recklessly and egregiously with conduct that is willful, wanton, malicious, bad-faith, deliberate, wrongful, and flagrant by its continued infringing activity despite this possessing specific knowledge of the accused infringement. On or about May 26, 2016, Finjan informed Defendant of its patent portfolio, including the Asserted Patents and Defendant's infringement thereof. On or about May 26, 2016, Finjan provided a representative claim chart mapping the '305 Patent Defendant's '305

1 Accused Products and services. Defendant also has direct knowledge of the '194 Patent, which is
2 incorporated by reference by and is related to the '305 Patent. Finjan diligently, but unsuccessfully,
3 attempted to engage in good faith negotiations with Defendant regarding Finjan's patent portfolio,
4 explaining Defendant's infringement of a representative claim of the '305 Patent, element-by-
5 element.

6 98. On information and belief, even after being shown detailed analysis of how its
7 products infringe Finjan's '305 Patent, Defendant has made no effort to design its products or
8 services around Finjan's '305 Patent, in order to avoid infringement. Instead, on information and
9 belief, Defendant incorporated infringing technology into additional products, such as those identified
10 in this Complaint. All of these actions demonstrate Defendant's blatant and egregious disregard for
11 Finjan's patent rights.

12 99. Despite its knowledge of Finjan's patent portfolio and Asserted Patents, and being
13 provided a representative claim chart of Finjan patents, Defendant has sold and continues to sell the
14 accused products and services in complete and reckless disregard of Finjan's patent rights. As such,
15 Defendant has acted recklessly and continues to willfully, wantonly, and deliberately engage in acts
16 of infringement of the '305 Patent, justifying an award to Finjan of increased damages under 35
17 U.S.C. § 284, and attorneys' fees and costs incurred under 35 U.S.C. § 285.

18 **COUNT VIII**

19 **(Indirect Infringement of the '305 Patent pursuant to 35 U.S.C. § 271(b))**

20 100. Finjan repeats, realleges, and incorporates by reference, as if fully set forth herein, the
21 allegations of the preceding paragraphs, as set forth above.

22 101. Defendant has induced and continues to induce infringement of at least Claims 13-24
23 of the '305 Patent under 35 U.S.C. § 271(b).

24 102. In addition to directly infringing the '305 Patent, Defendant indirectly infringes the
25 '305 Patent pursuant to 35 U.S.C. § 271(b) by instructing, directing and/or requiring others, including
26 customers, purchasers, users and developers, to perform one or more of the steps of the method
27 claims, either literally or under the doctrine of equivalents, of the '305 Patent, where all the steps of
28

1 the method claims are performed by either Defendant, its customers, purchasers, users, and
2 developers, or some combination thereof. Defendant knew or was willfully blind to the fact that it
3 was inducing others, including customers, purchasers, users, and developers, to infringe by
4 practicing, either themselves or in conjunction with Defendant, one or more method claims of the
5 ‘305 Patent, including Claims 13-24.

6 103. Defendant knowingly and actively aided and abetted the direct infringement of the
7 ‘305 Patent by instructing and encouraging its customers, purchasers, users, and developers to use the
8 ‘305 Accused Products. Such instruction and encouragement includes, but is not limited to, advising
9 third parties to use the ‘305 Accused Products in an infringing manner, providing a mechanism
10 through which third parties may infringe the ‘305 Patent, advertising and promoting the use of the
11 ‘305 Accused Products in an infringing manner, and distributing guidelines and instructions to third
12 parties on how to use the ‘305 Accused Products in an infringing manner.

13 104. Defendant updates and maintains an HTTP site with Defendant’s quick start guides,
14 administration guides, user guides, operating instructions, and training and certifications which cover
15 in depth aspects of operating Defendant’s offerings. *See, e.g.,* <https://help.zscaler.com/zia> and
16 [https://www.zscaler.com/resources/training-certification-](https://www.zscaler.com/resources/training-certification-overview?_ga=2.110592453.1966009248.1511983057-74035905.1511983057)
17 [overview?_ga=2.110592453.1966009248.1511983057-74035905.1511983057](https://www.zscaler.com/resources/training-certification-overview?_ga=2.110592453.1966009248.1511983057-74035905.1511983057), attached hereto as
18 Exhibits 14–15.

19 **PRAYER FOR RELIEF**

20 WHEREFORE, Finjan prays for judgment and relief as follows:

21 A. An entry of judgment holding that Zscaler has infringed the ‘780 Patent, the ‘633
22 Patent, the ‘494 Patent, and the ‘305 Patent and is continuing to infringe the ‘633 Patent and ‘305
23 Patent; and has induced infringement of the ‘780 Patent, the ‘633 Patent, the ‘494 Patent, and the
24 ‘305 Patent and is continuing to induce infringement of the ‘633 Patent and ‘305 Patent;

25 B. A preliminary and permanent injunction against Zscaler and its officers, employees,
26 agents, servants, attorneys, instrumentalities, and/or those in privity with them, from continuing to
27 infringe the ‘633 Patent and the ‘305 Patent, or inducing the infringement of the ‘633 Patent and the
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1 ‘305 Patent, and for all further and proper injunctive relief pursuant to 35 U.S.C. § 283;

2 C. An award to Finjan of such past damages as it shall prove at trial against Zscaler that
3 are adequate to fully compensate Finjan for Zscaler’s infringement of the ‘844 Patent, the ‘780
4 Patent, the ‘633 Patent, the ‘494 Patent, and the ‘305 Patent, said damages to be no less than a
5 reasonable royalty;

6 D. A determination that Zscaler’s infringement has been willful, wanton, and deliberate
7 and that the damages against it be increased up to treble on this basis or for any other basis in
8 accordance with the law;

9 E. A finding that this case is “exceptional” and an award to Finjan of its costs and
10 reasonable attorneys’ fees, as provided by 35 U.S.C. § 285;

11 F. An accounting of all infringing sales and revenues, together with post judgment
12 interest and prejudgment interest from the first date of infringement of the ‘780 Patent, the ‘633
13 Patent, the ‘494 Patent, and the ‘305 Patent; and

14 G. Such further and other relief as the Court may deem proper.

15 Respectfully submitted,

16 Dated: December 5, 2017

17 By: /s/ Paul J. Andre

18 Paul J. Andre (State Bar No. 196585)
19 Lisa Kobialka (State Bar No. 191404)
20 James Hannah (State Bar No. 237978)
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Attorneys for Plaintiff
FINJAN, INC.

DEMAND FOR JURY TRIAL

1
2 Finjan demands a jury trial on all issues so triable.

3 Respectfully submitted,

4 Dated: December 5, 2017

By: /s/ Paul J. Andre

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18 FINJAN, INC.