

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WEBROOT, INC. and
OPEN TEXT, INC.,

Plaintiffs

v.

FORCEPOINT LLC,

Defendant.

FORCEPOINT LLC,

Counterclaim Plaintiff,

v.

WEBROOT, INC., OPEN TEXT, INC., and
OPEN TEXT CORPORATION

Counterclaim-
Defendants.

CIVIL ACTION NO. 6:22-CV-00342

JURY TRIAL DEMANDED

**DEFENDANT FORCEPOINT LLC'S
FINAL INVALIDITY CONTENTIONS**

I. INTRODUCTION

Pursuant to the Court's Standing Order Governing Proceedings (OGP 4.1) – Patent Cases, Dkt. No. 13 (the "Order") and the Scheduling Order in this case, Defendant Forcepoint LLC ("Forcepoint" or "Defendant") hereby provides the following Final Invalidity Contentions ("Contentions") to Plaintiffs and Counterclaim Defendants Webroot Inc. ("Webroot"), Open Text, Inc. ("OTI"), and Open Text Corp. ("OTC") (collectively, "Plaintiffs") for asserted U.S. Patent Nos. 10,025,928 (the "'928 Patent"), 8,438,386 (the "'386 Patent"), 10,599,844 (the "'844 Patent"), 8,726,389 (the "'389 Patent"), 9,413,721 (the "'721 Patent"), 8,201,243 (the "'243

Further, by submitting this ineligibility contention, Forcepoint does not waive and hereby expressly reserves its right to raise invalidity defenses including, but not limited, to defenses under 35 U.S.C. §§ 102, 103, and/or 112.

Discovery in this case is ongoing and, accordingly, this ineligibility contention is not to be considered final. Forcepoint reserves all rights to revise, amend, or supplement this ineligibility claim at a later date as discovery progresses, if the Court issues further claim construction rulings, or if Plaintiffs amend their Infringement Contentions.

X. INVALIDITY CONTENTIONS FOR THE '869 PATENT

A. General State of the Art at the Time of the Alleged Inventions

The prior art references identified in these Invalidity Contentions, and the “References Cited” on the face of the '869 Patent, may provide background and context pertinent to the teachings in, and interpretation of, the prior art referenced by the attached claim charts. Forcepoint may rely upon that prior art, including the “References Cited” on the face of the '869 Patent, to demonstrate the general state of the art at the time of the alleged inventions and what one of ordinary skill in the art would have understood at a time prior to the date of the alleged invention of the Asserted Claims. This prior art is exemplary only and is not in any way intended to limit the scope of what one of ordinary skill in the art would have understood at the times of the alleged inventions. Forcepoint reserves the right to rely upon additional prior art, information, and/or knowledge to demonstrate what one of ordinary skill would have understood at any time prior to the date of alleged invention of the Asserted Claims.

B. Claim Charts

Pursuant to Section II, Paragraph 4 of the Order, the claim charts attached in Appendix A as Exhibits 869-H-1 through 869-H-38 identify where each limitation of the Asserted Claims of the '869 Patent is found in the prior art.

C. Identification of the Prior Art

Based on Plaintiffs' Preliminary Infringement Contentions and authorized supplements thereto, Forcepoint identifies prior art below and in Appendix A as Exhibits 869-H-1 through 869-H-38, which contains charts disclosing the identity of each item of prior art that anticipates each claim and/or renders it obvious. As shown in Appendix A as Exhibits 869-H-1 through 869-H-38 and below, Forcepoint has identified each prior art reference by its number, country of origin, author, and date of issue (where applicable). Forcepoint notes that it has applied the prior art in accordance with Plaintiffs' improper assertions of infringement and improper applications of the claims. Forcepoint does not agree with Plaintiffs' application of the claims and denies infringement.

Forcepoint further contends that all claims that are anticipated by a particular reference are also rendered obvious by that same reference alone, in combination with the other references, and/or in combination with the knowledge of a person of ordinary skill in the art. Forcepoint reserves the right to rely upon any combination of the charted prior art under 35 U.S.C. § 103, yet Forcepoint has also identified exemplary obviousness combinations in Section V.E, *infra*.

'869 Patent Prior Art Patents/Patent Applications				
Ex. No.	Patent / Publication No.	Country of Origin	Filing Date	Date of Issue / Publication
Ex. 869-H-1	U.S. Patent No. 8,955,133 B2 ("Kumar")	U.S.	Jun. 9, 2011	Feb. 10, 2015
Ex. 869-H-2	U.S. Patent No. 10,268,820 ("Okano")	U.S.	Jun. 8, 2015	Apr. 23, 2019
Ex. 869-H-3	U.S. Patent No. 9,672,355 B2 ("Titonis")	U.S.	Sep. 14, 2012	Jun. 6, 2017
Ex. 869-H-4	U.S. Patent Publication No. 2006/0037080A1 ("Malooof")	U.S.	Aug. 12, 2005	Feb. 16, 2006

'869 Patent Prior Art Patents/Patent Applications				
Ex. No.	Patent / Publication No.	Country of Origin	Filing Date	Date of Issue / Publication
Ex. 869-H-5	U.S. Patent Publication No. 2014/0090061A1 ("Avasarala")	U.S.	Sep. 26, 2013	Mar. 27, 2014
Ex. 869-H-6	U.S. Patent No. 9,245,120 ("Friedrichs")	U.S.	Jul. 15, 2013	Jan. 26, 2016
Ex. 869-H-7	U.S. Patent Publication No. 2015/0213376A1 ("Ideses")	U.S.	Jan. 29, 2015	Jul. 30, 2015
Ex. 869-H-8	U.S. Patent Publication No. 2010/0162395 ("Kennedy")	U.S.	Dec. 18, 2008	Jun. 24, 2010
Ex. 869-H-9	U.S. Patent Publication No. 2017/0098074A1 ("Okano 074")	U.S.	Jun. 8, 2015	Apr. 6, 2017
Ex. 869-H-10	U.S. Patent No. 9,398,034 ("Ronen")	U.S.	Dec. 19, 2013	Jul. 19, 2016
Ex. 869-H-11	U.S. Patent No. 8,799,190 ("Stokes")	U.S.	Jun. 17, 2011	Aug. 5, 2014
Ex. 869-H-12	EP2182458 ("Moskovitch")	Europe	Oct. 1, 2009	May 5, 2010
Ex. 869-H-13	U.S. Patent Publication No. 2011/0225655 ("Niemela")	U.S.	Mar. 15, 2010	Sep. 15, 2011
Ex. 869-H-14	U.S. Patent Publication No. 2014/0181973 ("Lee")	U.S.	May 7, 2013	Jun. 26, 2014
Ex. 869-H-15	U.S. Patent Publication No. 2015/0096024A1 ("Haq")	U.S.	Sep. 30, 2013	Apr. 2, 2015
Ex. 869-H-16	U.S. Patent No. 7,689,531 ("Diao 531")	U.S.	Sep. 28, 2005	Mar. 30, 2010
Ex. 869-H-17	U.S. Patent No. 7,756,535 ("Diao 535")	U.S.	Jul. 7, 2006	Jul. 13, 2010
Ex. 869-H-18	U.S. Patent No. 7,949,771 ("Chen 771")	U.S.	Sep. 5, 2007	May 24, 2011

'869 Patent Prior Art Patents/Patent Applications				
Ex. No.	Patent / Publication No.	Country of Origin	Filing Date	Date of Issue / Publication
Ex. 869-H-19	U.S. Patent No. 8,023,974 (“Diao 974”)	U.S.	Feb. 15, 2007	Sep. 20, 2011
Ex. 869-H-20	U.S. Patent No. 8,161,548 (“Wan”)	U.S.	Aug. 15, 2005	Apr. 17, 2012
Ex. 869-H-21	U.S. Patent No. 8,495,144 (“Cheng”)	U.S.	Oct. 6, 2004	Jul. 23, 2013
Ex. 869-H-22	U.S. Patent No. 8,505,094 (“Xuewen”)	U.S.	Jan. 13, 2010	Aug. 6, 2013
Ex. 869-H-23	U.S. Patent No. 8,560,466 (“Diao 466”)	U.S.	Feb. 26, 2010	Oct. 15, 2013
Ex. 869-H-24	U.S. Patent No. 8,826,439 (“Hu”)	U.S.	Jan. 26, 2011	Sep. 2, 2014
Ex. 869-H-25	U.S. Patent No. 8,838,992 (“Zhu”)	U.S.	Apr. 28, 2011	Sep. 16, 2014
Ex. 869-H-26	U.S. Patent No. 8,850,570 (“Ramzan”)	U.S.	Jun. 30, 2008	Sep. 30, 2014
Ex. 869-H-27	U.S. Patent No. 8,935,788 (“Diao”)	U.S.	Oct. 15, 2008	Jan. 13, 2015
Ex. 869-H-28	U.S. Patent No. 9,208,323 (“Karta”)	U.S.	Jan. 13, 2014	Dec. 8, 2015
Ex. 869-H-29	U.S. Patent No. 9,781,151 (“McCorkendale”)	U.S.	Oct. 11, 2011	Oct. 3, 2017
Ex. 869-H-30	U.S. Patent No. 10,666,676 (“Hsu”)	U.S.	Aug. 18, 2014	May 26, 2020
Ex. 869-H-31	U.S. Patent Publication No. 2006/0026675A1 (“Cai”)	U.S.	Jul. 28, 2004	Feb. 2, 2006
Ex. 869-H-32	U.S. Patent Publication No. 2009/0254992A1 (“Schultz”)	U.S.	Dec. 18, 2008	Oct. 8, 2009

'869 Patent Prior Art Patents/Patent Applications				
Ex. No.	Patent / Publication No.	Country of Origin	Filing Date	Date of Issue / Publication
Ex. 869-H-33	R.R. Ravula, <i>Classification of Malware Using Reverse Engineering and Data Mining Techniques</i> (August 2011) ("Ravula")			August 2011
Ex. 869-H-34	Masud et al., <i>Data Mining Tools For Malware Detection</i> (2011) ("Masud")			2011
Ex. 869-H-35	Tahan et al., <i>Mal-ID: Automatic Malware Detection Using Common Segment Analysis and Meta-Features</i> , (April 2012) ("Tahan")			April 2012
Ex. 869-H-36	Menahem et al., <i>Improving Malware Detection by Applying Multi-Inducer Ensemble</i> , (February 2009), ("Menahem")			February 2009

'869 Patent Prior Art Systems	
Ex. No.	System
Ex. 869-H-37	Websense ThreatSeeker ("ThreatSeeker")
Ex. 869-H-38	Stonesoft StoneGate Next Generation Firewall ("Next Generation Firewall")
	System and/or product art received pursuant to Forcepoint's subpoena to Trend Micro, Inc. (dated October 27, 2023)
	System and/or product art received pursuant to Forcepoint's subpoena to Sophos Ltd. (dated October 31, 2023)

'869 Patent Additional Prior Art/Background Art
U.S. Patent Publication No. 2010/0191734A1 ("Rajaram")
U.S. Patent Publication No. 2014/0090064A1 ("Pistoia")
U.S. Patent No. 8,533,831 ("Satish")
U.S. Patent No. 8,885,938 ("Hong")
U.S. Patent No. 9,129,110 ("Mason")

'869 Patent Additional Prior Art/Background Art
U.S. Patent No. 9,497,204 ("Symons")
U.S. Patent No. 9,516,039 ("Yen")
U.S. Patent No. 9,832,211 ("Hsiao")
U.S. Patent No. 9,853,997 ("Canzanese")
U.S. Patent No. 8,578,497 ("Antonakakis")
U.S. Patent Publication No. 2016/0277423A1 ("Apostolescu")
U.S. Patent Publication No. 2011/0047618A1 ("Evans")
U.S. Patent Publication No. 2013/0198841A1 ("Poulson")
U.S. Patent Publication No. 2007/0240220A1 ("Tuvell")
U.S. Patent No. 8,719,939 ("Krasser")
U.S. Patent No. 9,286,182 ("Fries")
U.S. Patent No. 9,330,257 ("Valencia")
U.S. Patent No. 10,395,032 ("Keller")
U.S. Patent No. 9,398,034 ("Brand")
CN 103473506 ("Yang")
CN 103106365 ("Lai")
CN102142068 ("Li")
Shafiq et al., <i>A Framework for Efficient Mining of Structural Information to Detect Zero-Day Malicious Portable Executables</i> , Jan. 2009 ("Shafiq")
Shafiq et al., <i>PE-Probe: Leveraging Packer Detection and Structural Information to Detect Malicious Portable Executables</i> , National University of Computer & Emerging Sciences, June 2009 ("Shafiq, Tabish")
Wang et al., <i>Detection of packed executables using support vector machines</i> , IEEE Xplore, August 2011 ("Wang")
Nath et al., <i>Static Malware Analysis Using Machine Learning Methods</i> , University of Hyderabad, 2014 ("Nath")
Sun et al., <i>Pattern Recognition Techniques for the Classification of Malware Packers</i> , RMIT University, 2010 ("Sun")
Nataraj et al., <i>Detecting Packed Executables Based On Raw Binary Data</i> , University of California, Santa Barbara, 2010 ("Nataraj")
Tang et al., <i>Support Vector Machines and Random Forests Modeling for Spam Senders Behaviour Analysis</i> , IEEE "GLOBECOM", 2008 ("Tang")
Krasser et al., <i>Valkyrie: Behavioural Malware Detection Using Global Kernel-Level Telemetry Data</i> , IEEE International, 2015 ("Krasser")
Wang et al., <i>Detecting Unknown Malicious Executables Using Portable Executable Headers</i> , IEEE, 2009 ("Wang et al.")
Lai, <i>A Feature Selection for Malicious Detection</i> , Beijing University, 2008 ("Lai")

Furthermore, with respect to the '869 Patent, under 35 U.S.C. §§ 102(a) and (b), Forcepoint reserves the right to identify additional prior art systems developed prior to May 12, 2015. *See, e.g., Intell. Ventures II LLC v. FedEx Corp.*, No. 2:16-CV-00980-JRG, 2019 WL 1434656, at *8–11 (E.D. Tex. Mar. 29, 2019). Discovery is ongoing, and Forcepoint reserves the right to amend the Invalidity Contentions herein based on third-party discovery.

D. Anticipation

At least under Plaintiffs' apparent infringement theory, the Asserted Claims of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by the references as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Kumar, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Titonis, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Okano, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Moskovitch, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person

having ordinary skill in the art, by Menaham, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Tahan, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Cai, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Schultz, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Kennedy, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Niemela, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Lee, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Haq, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–

59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Diao 531, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Diao 535, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Chen, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Diao 974, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Wan, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Cheng, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Xuwen, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Diao 466, as set forth in the attached claim charts. At least under

Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Hu, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Zhu, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Ramzan, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Diao 788, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by McCorkendale, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by Hsu, as set forth in the attached claim charts. At least under Plaintiffs' apparent infringement theory, Asserted Claims 18–21, 24, 26–35, 40–49, 52, and 54–59 of the '869 Patent are anticipated, either expressly or inherently as understood by a person having ordinary skill in the art, by ThreatSeeker, as set forth in the attached claim charts.

E. Obviousness

At least under Plaintiffs' apparent infringement theory, the Asserted Claims of the '869 Patent are rendered obvious by the references identified in the attached claim charts, either alone

or in the combinations with other prior art references as identified below. Forcepoint contends that one of ordinary skill in the art, at the time of the alleged invention of the Asserted '869 Patent Claims, would have been motivated to combine the references disclosed herein in such a way to reach the alleged inventions. In certain instances, the suggested obviousness combinations are provided in the alternative to Forcepoint's anticipation contentions, which shall not be construed to suggest that any reference included in the combinations is not by itself anticipatory. The combinations evidencing teachings, suggestions, and/or motivations to combine the prior-art references in a way that renders the Asserted Claims obvious are merely exemplary.

Primary Reference	In Combination With
Kumar	Okano
Kumar	Titonis
Kumar	Moskovitch
Kumar	Menahem
Kumar	Tahan
Kumar	Cai
Kumar	Schultz
Kumar	Kennedy
Kumar	Niemela
Kumar	Lee
Kumar	Haq
Kumar	Diao 535
Kumar	Diao 531
Kumar	Chen
Kumar	Diao 974

Primary Reference	In Combination With
Kumar	Wan
Kumar	Cheng
Kumar	Xuewen
Kumar	Diao 466
Kumar	Hu
Kumar	Zhu
Kumar	Ramzan
Kumar	Diao 788
Kumar	McCorkendale
Kumar	Hsu
Kumar	Idses
Kumar	Okano 074
Kumar	Stokes
Kumar	Friedrichs
Kumar	Maloof
Kumar	Avasarala
Kumar	Ronen
Kumar	Karta
Kumar	Ravula
Kumar	Masud
Kumar	ThreatSeeker
Kumar	Next Generation Firewall
Kumar	ThreatSeeker + Titonis

Primary Reference	In Combination With
Kumar	ThreatSeeker + Moskovitch
Kumar	ThreatSeeker + Okano
Kumar	ThreatSeeker + Schultz
Kumar	ThreatSeeker + Diao 466
Titonis	Kumar
Titonis	Okano
Titonis	Moskovitch
Titonis	Menahem
Titonis	Tahan
Titonis	Cai
Titonis	Schultz
Titonis	Kennedy
Titonis	Niemela
Titonis	Lee
Titonis	Haq
Titonis	Diao 535
Titonis	Diao 531
Titonis	Chen
Titonis	Diao 974
Titonis	Wan
Titonis	Cheng
Titonis	Xuwen
Titonis	Diao 466

Primary Reference	In Combination With
Titonis	Hu
Titonis	Zhu
Titonis	Ramzan
Titonis	Diao 788
Titonis	McCorkendale
Titonis	Hsu
Titonis	Idses
Titonis	Okano 074
Titonis	Stokes
Titonis	Friedrichs
Titonis	Maloof
Titonis	Avasarala
Titonis	Ronen
Titonis	Karta
Titonis	Ravula
Titonis	Masud
Titonis	ThreatSeeker
Titonis	Next Generation Firewall
Titomis	ThreatSeeker + Okano
Titonis	Kumar + Okano
Titonis	ThreatSeeker + Kumar
Titonis	ThreatSeeker + Schultz
Titonis	Kumar + Schultz

Primary Reference	In Combination With
Titonis	ThreatSeeker + Diao 466
Titonis	Kumar + Diao 466
Titonis	ThreatSeeker + Moskovitch
Titonis	Kumar + Moskovitch
Okano	Kumar
Okano	Titonis
Okano	Moskovitch
Okano	Menahem
Okano	Tahan
Okano	Cai
Okano	Schultz
Okano	Kennedy
Okano	Niemela
Okano	Lee
Okano	Haq
Okano	Diao 535
Okano	Diao 531
Okano	Chen
Okano	Diao 974
Okano	Wan
Okano	Cheng
Okano	Xuwen
Okano	Diao 466

Primary Reference	In Combination With
Okano	Hu
Okano	Zhu
Okano	Ramzan
Okano	Diao 788
Okano	McCorkendale
Okano	Hsu
Okano	Idses
Okano	Okano 074
Okano	Stokes
Okano	Friedrichs
Okano	Maloof
Okano	Avasarala
Okano	Ronen
Okano	Karta
Okano	Ravula
Okano	Masud
Okano	ThreatSeeker
Okano	Next Generation Firewall
Okano	Moskovitch + ThreatSeeker
Okano	Moskovitch + Kumar
Okano	ThreatSeeker + Diao 466
Okano	Kumar + Diao 466
Okano	ThreatSeeker + Schultz

Primary Reference	In Combination With
Okano	Kumar + Schultz
Okano	ThreatSeeker + Kumar
Moskovitch	Okano
Moskovitch	Kumar
Moskovitch	Titonis
Moskovitch	Menahem
Moskovitch	Tahan
Moskovitch	Cai
Moskovitch	Schultz
Moskovitch	Kennedy
Moskovitch	Niemela
Moskovitch	Lee
Moskovitch	Haq
Moskovitch	Diao 535
Moskovitch	Diao 531
Moskovitch	Chen
Moskovitch	Diao 974
Moskovitch	Wan
Moskovitch	Cheng
Moskovitch	Xuwen
Moskovitch	Diao 466
Moskovitch	Hu
Moskovitch	Zhu

Primary Reference	In Combination With
Moskovitch	Ramzan
Moskovitch	Diao 788
Moskovitch	McCorkendale
Moskovitch	Hsu
Moskovitch	Idses
Moskovitch	Okano 074
Moskovitch	Stokes
Moskovitch	Friedrichs
Moskovitch	Maloof
Moskovitch	Avasarala
Moskovitch	Ronen
Moskovitch	Karta
Moskovitch	Ravula
Moskovitch	Masud
Moskovitch	ThreatSeeker
Moskovitch	Next Generation Firewall
Moskovitch	ThreatSeeker + Kumar
Moskovitch	Okano + Kumar
Moskovitch	Okano + ThreatSeeker
Moskovitch	Schultz + Kumar
Moskovitch	Schultz + ThreatSeeker
Moskovitch	ThreatSeeker + Diao 466
Moskovitch	Kumar + Diao 466

Primary Reference	In Combination With
Menahem	Moskovitch
Menahem	Okano
Menahem	Kumar
Menahem	Titonis
Menahem	Tahan
Menahem	Cai
Menahem	Schultz
Menahem	Kennedy
Menahem	Niemela
Menahem	Lee
Menahem	Haq
Menahem	Diao 535
Menahem	Diao 531
Menahem	Chen
Menahem	Diao 974
Menahem	Wan
Menahem	Cheng
Menahem	Xuewen
Menahem	Diao 466
Menahem	Hu
Menahem	Zhu
Menahem	Ramzan
Menahem	Diao 788

Primary Reference	In Combination With
Menahem	McCorkendale
Menahem	Hsu
Menahem	Idses
Menahem	Okano 074
Menahem	Stokes
Menahem	Friedrichs
Menahem	Maloof
Menahem	Avasarala
Menahem	Ronen
Menahem	Karta
Menahem	Ravula
Menahem	Masud
Menahem	ThreatSeeker
Menahem	Next Generation Firewall
Menahem	ThreatSeeker + Kumar
Menahem	ThreatSeeker + Okano
Menahem	Okano + Kumar
Menahem	ThreatSeeker + Schultz
Menahem	Kumar + Schultz
Menahem	Okano + Schultz
Tahan	Menahem
Tahan	Moskovitch
Tahan	Okano

Primary Reference	In Combination With
Tahan	Kumar
Tahan	Titonis
Tahan	Cai
Tahan	Schultz
Tahan	Kennedy
Tahan	Niemela
Tahan	Lee
Tahan	Haq
Tahan	Diao 535
Tahan	Diao 531
Tahan	Chen
Tahan	Diao 974
Tahan	Wan
Tahan	Cheng
Tahan	Xuewen
Tahan	Diao 466
Tahan	Hu
Tahan	Zhu
Tahan	Ramzan
Tahan	Diao 788
Tahan	McCorkendale
Tahan	Hsu
Tahan	Idses

Primary Reference	In Combination With
Tahan	Okano 074
Tahan	Stokes
Tahan	Friedrichs
Tahan	Maloof
Tahan	Avasarala
Tahan	Ronen
Tahan	Karta
Tahan	Ravula
Tahan	Masud
Tahan	ThreatSeeker
Tahan	Next Generation Firewall
Tahan	ThreatSeeker + Kumar
Tahan	ThreatSeeker + Okano
Tahan	Okano + Kumar
Cai	Tahan
Cai	Menahem
Cai	Moskovitch
Cai	Okano
Cai	Kumar
Cai	Titonis
Cai	Schultz
Cai	Kennedy
Cai	Niemela

Primary Reference	In Combination With
Cai	Lee
Cai	Haq
Cai	Diao 535
Cai	Diao 531
Cai	Chen
Cai	Diao 974
Cai	Wan
Cai	Cheng
Cai	Xuewen
Cai	Diao 466
Cai	Hu
Cai	Zhu
Cai	Ramzan
Cai	Diao 788
Cai	McCorkendale
Cai	Hsu
Cai	Idses
Cai	Okano 074
Cai	Stokes
Cai	Friedrichs
Cai	Maloof
Cai	Avasarala
Cai	Ronen

Primary Reference	In Combination With
Cai	Karta
Cai	Ravula
Cai	Masud
Cai	ThreatSeeker
Cai	Next Generation Firewall
Cai	ThreatSeeker + Kumar
Cai	ThreatSeeker + Okano
Cai	Okano + Kumar
Cai	Ramzan + ThreatSeeker
Cai	Ramzan + Kumar
Cai	Ramzan + Okano
Schultz	Cai
Schultz	Tahan
Schultz	Menahem
Schultz	Moskovitch
Schultz	Okano
Schultz	Kumar
Schultz	Titonis
Schultz	Kennedy
Schultz	Niemela
Schultz	Lee
Schultz	Haq
Schultz	Diao 535

Primary Reference	In Combination With
Schultz	Diao 531
Schultz	Chen
Schultz	Diao 974
Schultz	Wan
Schultz	Cheng
Schultz	Xuewen
Schultz	Diao 466
Schultz	Hu
Schultz	Zhu
Schultz	Ramzan
Schultz	Diao 788
Schultz	McCorkendale
Schultz	Hsu
Schultz	Idses
Schultz	Okano 074
Schultz	Stokes
Schultz	Friedrichs
Schultz	Maloof
Schultz	Avasarala
Schultz	Ronen
Schultz	Karta
Schultz	Ravula
Schultz	Masud

Primary Reference	In Combination With
Schultz	ThreatSeeker
Schultz	Next Generation Firewall
Schultz	ThreatSeeker + Kumar
Schultz	ThreatSeeker + Okano
Schultz	Okano + Kumar
Schultz	Ramzan + ThreatSeeker
Schultz	Ramzan + Okano
Schultz	Ramzan + Kumar
Kennedy	Schultz
Kennedy	Cai
Kennedy	Tahan
Kennedy	Menahem
Kennedy	Moskovitch
Kennedy	Okano
Kennedy	Kumar
Kennedy	Titonis
Kennedy	Niemela
Kennedy	Lee
Kennedy	Haq
Kennedy	Diao 535
Kennedy	Diao 531
Kennedy	Chen
Kennedy	Diao 974

Primary Reference	In Combination With
Kennedy	Wan
Kennedy	Cheng
Kennedy	Xuewen
Kennedy	Diao 466
Kennedy	Hu
Kennedy	Zhu
Kennedy	Ramzan
Kennedy	Diao 788
Kennedy	McCorkendale
Kennedy	Hsu
Kennedy	Idses
Kennedy	Okano 074
Kennedy	Stokes
Kennedy	Friedrichs
Kennedy	Maloof
Kennedy	Avasarala
Kennedy	Ronen
Kennedy	Karta
Kennedy	Ravula
Kennedy	Masud
Kennedy	ThreatSeeker
Kennedy	Next Generation Firewall
Kennedy	ThreatSeeker + Kumar

Primary Reference	In Combination With
Kennedy	ThreatSeeker + Okano
Kennedy	Okano + Kumar
Niemela	Kennedy
Niemela	Schultz
Niemela	Okano
Niemela	Kumar
Niemela	Titonis
Niemela	Lee
Niemela	Haq
Niemela	Diao 535
Niemela	Diao 531
Niemela	Chen
Niemela	Diao 974
Niemela	Wan
Niemela	Cheng
Niemela	Xuwen
Niemela	Diao 466
Niemela	Hu
Niemela	Zhu
Niemela	Ramzan
Niemela	Diao 788
Niemela	McCorkendale
Niemela	Hsu

Primary Reference	In Combination With
Niemela	Idses
Niemela	Okano 074
Niemela	Stokes
Niemela	Friedrichs
Niemela	Maloof
Niemela	Avasarala
Niemela	Ronen
Niemela	Karta
Niemela	Ravula
Niemela	Masud
Niemela	ThreatSeeker
Niemela	Next Generation Firewall
Niemela	ThreatSeeker + Kumar
Niemela	ThreatSeeker + Okano
Niemela	Okano + Kumar
Lee	Niemela
Lee	Kennedy
Lee	Schultz
Lee	Cai
Lee	Tahan
Lee	Menahem
Lee	Moskovitch
Lee	Okano

Primary Reference	In Combination With
Lee	Kumar
Lee	Titonis
Lee	Haq
Lee	Diao 535
Lee	Diao 531
Lee	Chen
Lee	Diao 974
Lee	Wan
Lee	Cheng
Lee	Xuewen
Lee	Diao 466
Lee	Hu
Lee	Zhu
Lee	Ramzan
Lee	Diao 788
Lee	McCorkendale
Lee	Hsu
Lee	Idses
Lee	Okano 074
Lee	Stokes
Lee	Friedrichs
Lee	Maloof
Lee	Avasarala

Primary Reference	In Combination With
Lee	Ronen
Lee	Karta
Lee	Ravula
Lee	Masud
Lee	ThreatSeeker
Lee	Next Generation Firewall
Lee	ThreatSeeker + Kumar
Lee	ThreatSeeker + Okano
Lee	Okano + Kumar
Haq	Lee
Haq	Cai
Haq	Tahan
Haq	Menahem
Haq	Moskovitch
Haq	Niemela
Haq	Kennedy
Haq	Schultz
Haq	Okano
Haq	Kumar
Haq	Titonis
Haq	Diao 535
Haq	Diao 531
Haq	Chen

Primary Reference	In Combination With
Haq	Diao 974
Haq	Wan
Haq	Cheng
Haq	Xuewen
Haq	Diao 466
Haq	Hu
Haq	Zhu
Haq	Ramzan
Haq	Diao 788
Haq	McCorkendale
Haq	Hsu
Haq	Idses
Haq	Okano 074
Haq	Stokes
Haq	Friedrichs
Haq	Maloof
Haq	Avasarala
Haq	Ronen
Haq	Karta
Haq	Ravula
Haq	Masud
Haq	ThreatSeeker
Haq	Next Generation Firewall

Primary Reference	In Combination With
Haq	ThreatSeeker + Kumar
Haq	ThreatSeeker + Okano
Haq	Okano + Kumar
Haq	ThreatSeeker + Moskovitch
Haq	ThreatSeeker + Menahem
Haq	Kumar + Moskovitch
Haq	Kumar + Menahem
Diao 535	Haq
Diao 535	Lee
Diao 535	Cai
Diao 535	Tahan
Diao 535	Menahem
Diao 535	Moskovitch
Diao 535	Niemela
Diao 535	Kennedy
Diao 535	Schultz
Diao 535	Okano
Diao 535	Kumar
Diao 535	Titonis
Diao 535	Diao 531
Diao 535	Chen
Diao 535	Diao 974
Diao 535	Wan

Primary Reference	In Combination With
Diao 535	Cheng
Diao 535	Xuewen
Diao 535	Diao 466
Diao 535	Hu
Diao 535	Zhu
Diao 535	Ramzan
Diao 535	Diao 788
Diao 535	McCorkendale
Diao 535	Hsu
Diao 535	Idses
Diao 535	Okano 074
Diao 535	Stokes
Diao 535	Friedrichs
Diao 535	Maloof
Diao 535	Avasarala
Diao 535	Ronen
Diao 535	Karta
Diao 535	Ravula
Diao 535	Masud
Diao 535	ThreatSeeker
Diao 535	Next Generation Firewall
Diao 535	ThreatSeeker + Kumar
Diao 535	ThreatSeeker + Okano

Primary Reference	In Combination With
Diao 535	Okano + Kumar
Diao 531	Diao 535
Diao 531	Haq
Diao 531	Lee
Diao 531	Cai
Diao 531	Tahan
Diao 531	Menahem
Diao 531	Moskovitch
Diao 531	Niemela
Diao 531	Kennedy
Diao 531	Schultz
Diao 531	Okano
Diao 531	Kumar
Diao 531	Titonis
Diao 531	Chen
Diao 531	Diao 974
Diao 531	Wan
Diao 531	Cheng
Diao 531	Xuewen
Diao 531	Diao 466
Diao 531	Hu
Diao 531	Zhu
Diao 531	Ramzan

Primary Reference	In Combination With
Diao 531	Diao 788
Diao 531	McCorkendale
Diao 531	Hsu
Diao 531	Idses
Diao 531	Okano 074
Diao 531	Stokes
Diao 531	Friedrichs
Diao 531	Maloof
Diao 531	Avasarala
Diao 531	Ronen
Diao 531	Karta
Diao 531	Ravula
Diao 531	Masud
Diao 531	ThreatSeeker
Diao 531	Next Generation Firewall
Diao 531	ThreatSeeker + Kumar
Diao 531	ThreatSeeker + Okano
Diao 531	Okano + Kumar
Chen	Diao 531
Chen	Diao 535
Chen	Haq
Chen	Lee
Chen	Cai

Primary Reference	In Combination With
Chen	Tahan
Chen	Menahem
Chen	Moskovitch
Chen	Niemela
Chen	Kennedy
Chen	Schultz
Chen	Okano
Chen	Kumar
Chen	Titonis
Chen	Diao 974
Chen	Wan
Chen	Cheng
Chen	Xuewen
Chen	Diao 466
Chen	Hu
Chen	Zhu
Chen	Ramzan
Chen	Diao 788
Chen	McCorkendale
Chen	Hsu
Chen	Idses
Chen	Okano 074
Chen	Stokes

Primary Reference	In Combination With
Chen	Friedrichs
Chen	Maloof
Chen	Avasarala
Chen	Ronen
Chen	Karta
Chen	Ravula
Chen	Masud
Chen	ThreatSeeker
Chen	Next Generation Firewall
Chen	ThreatSeeker + Kumar
Chen	ThreatSeeker + Okano
Chen	Okano + Kumar
Diao 974	Chen
Diao 974	Diao 531
Diao 974	Diao 535
Diao 974	Haq
Diao 974	Lee
Diao 974	Cai
Diao 974	Tahan
Diao 974	Menahem
Diao 974	Moskovitch
Diao 974	Niemela
Diao 974	Kennedy

Primary Reference	In Combination With
Diao 974	Schultz
Diao 974	Okano
Diao 974	Kumar
Diao 974	Titonis
Diao 974	Wan
Diao 974	Cheng
Diao 974	Xuewen
Diao 974	Diao 466
Diao 974	Hu
Diao 974	Zhu
Diao 974	Ramzan
Diao 974	Diao 788
Diao 974	McCorkendale
Diao 974	Hsu
Diao 974	Idses
Diao 974	Okano 074
Diao 974	Stokes
Diao 974	Friedrichs
Diao 974	Maloof
Diao 974	Avasarala
Diao 974	Ronen
Diao 974	Karta
Diao 974	Ravula

Primary Reference	In Combination With
Diao 974	Masud
Diao 974	ThreatSeeker
Diao 974	Next Generation Firewall
Diao 974	ThreatSeeker + Kumar
Diao 974	ThreatSeeker + Okano
Diao 974	Okano + Kumar
Wan	Diao 974
Wan	Chen
Wan	Diao 531
Wan	Diao 535
Wan	Haq
Wan	Lee
Wan	Cai
Wan	Tahan
Wan	Menahem
Wan	Moskovitch
Wan	Niemela
Wan	Kennedy
Wan	Schultz
Wan	Okano
Wan	Kumar
Wan	Titonis
Wan	Cheng

Primary Reference	In Combination With
Wan	Xuewen
Wan	Diao 466
Wan	Hu
Wan	Zhu
Wan	Ramzan
Wan	Diao 788
Wan	McCorkendale
Wan	Hsu
Wan	Idses
Wan	Okano 074
Wan	Stokes
Wan	Friedrichs
Wan	Maloof
Wan	Avasarala
Wan	Ronen
Wan	Karta
Wan	Ravula
Wan	Masud
Wan	ThreatSeeker
Wan	Next Generation Firewall
Wan	ThreatSeeker + Kumar
Wan	ThreatSeeker + Okano
Wan	Okano + Kumar

Primary Reference	In Combination With
Cheng	Wan
Cheng	Diao 974
Cheng	Chen
Cheng	Diao 531
Cheng	Diao 535
Cheng	Haq
Cheng	Lee
Cheng	Cai
Cheng	Tahan
Cheng	Menahem
Cheng	Moskovitch
Cheng	Niemela
Cheng	Kennedy
Cheng	Schultz
Cheng	Okano
Cheng	Kumar
Cheng	Titonis
Cheng	Xuewen
Cheng	Diao 466
Cheng	Hu
Cheng	Zhu
Cheng	Ramzan
Cheng	Diao 788

Primary Reference	In Combination With
Cheng	McCorkendale
Cheng	Hsu
Cheng	Idses
Cheng	Okano 074
Cheng	Stokes
Cheng	Friedrichs
Cheng	Maloof
Cheng	Avasarala
Cheng	Ronen
Cheng	Karta
Cheng	Ravula
Cheng	Masud
Cheng	ThreatSeeker
Cheng	Next Generation Firewall
Cheng	ThreatSeeker + Kumar
Cheng	ThreatSeeker + Okano
Cheng	Okano + Kumar
Xuewen	Cheng
Xuewen	Wan
Xuewen	Diao 974
Xuewen	Chen
Xuewen	Diao 531
Xuewen	Diao 535

Primary Reference	In Combination With
Xuewen	Haq
Xuewen	Lee
Xuewen	Cai
Xuewen	Tahan
Xuewen	Menahem
Xuewen	Moskovitch
Xuewen	Niemela
Xuewen	Kennedy
Xuewen	Schultz
Xuewen	Okano
Xuewen	Kumar
Xuewen	Titonis
Xuewen	Diao 466
Xuewen	Hu
Xuewen	Zhu
Xuewen	Ramzan
Xuewen	Diao 788
Xuewen	McCorkendale
Xuewen	Hsu
Xuewen	Idses
Xuewen	Okano 074
Xuewen	Stokes
Xuewen	Friedrichs

Primary Reference	In Combination With
Xuewen	Maloof
Xuewen	Avasarala
Xuewen	Ronen
Xuewen	Karta
Xuewen	Ravula
Xuewen	Masud
Xuewen	ThreatSeeker
Xuewen	Next Generation Firewall
Xuewen	ThreatSeeker + Kumar
Xuewen	ThreatSeeker + Okano
Xuewen	Okano + Kumar
Diao 466	Xuewen
Diao 466	Cheng
Diao 466	Wan
Diao 466	Diao 974
Diao 466	Chen
Diao 466	Diao 531
Diao 466	Diao 535
Diao 466	Haq
Diao 466	Lee
Diao 466	Cai
Diao 466	Tahan
Diao 466	Menahem

Primary Reference	In Combination With
Diao 466	Moskovitch
Diao 466	Niemela
Diao 466	Kennedy
Diao 466	Schultz
Diao 466	Okano
Diao 466	Kumar
Diao 466	Titonis
Diao 466	Hu
Diao 466	Zhu
Diao 466	Ramzan
Diao 466	Diao 788
Diao 466	McCorkendale
Diao 466	Hsu
Diao 466	Idses
Diao 466	Okano 074
Diao 466	Stokes
Diao 466	Friedrichs
Diao 466	Maloof
Diao 466	Avasarala
Diao 466	Ronen
Diao 466	Karta
Diao 466	Ravula
Diao 466	Masud

Primary Reference	In Combination With
Diao 466	ThreatSeeker
Diao 466	Next Generation Firewall
Diao 466	ThreatSeeker + Kumar
Diao 466	ThreatSeeker + Okano
Diao 466	Okano + Kumar
Diao 466	Moskovitch + ThreatSeeker
Diao 466	Moskovitch + Kumar
Diao 466	Ramzan + ThreatSeeker
Diao 466	Ramzan + Kumar
Hu	Diao 466
Hu	Xuwen
Hu	Cheng
Hu	Wan
Hu	Diao 974
Hu	Chen
Hu	Diao 531
Hu	Diao 535
Hu	Haq
Hu	Lee
Hu	Cai
Hu	Tahan
Hu	Menahem
Hu	Moskovitch

Primary Reference	In Combination With
Hu	Niemela
Hu	Kennedy
Hu	Schultz
Hu	Okano
Hu	Kumar
Hu	Titonis
Hu	Zhu
Hu	Ramzan
Hu	Diao 788
Hu	McCorkendale
Hu	Hsu
Hu	Idses
Hu	Okano 074
Hu	Stokes
Hu	Friedrichs
Hu	Maloof
Hu	Avasarala
Hu	Ronen
Hu	Karta
Hu	Ravula
Hu	Masud
Hu	ThreatSeeker
Hu	Next Generation Firewall

Primary Reference	In Combination With
Hu	ThreatSeeker + Kumar
Hu	ThreatSeeker + Okano
Hu	Okano + Kumar
Zhu	Hu
Zhu	Diao 466
Zhu	Xuewen
Zhu	Cheng
Zhu	Wan
Zhu	Diao 974
Zhu	Chen
Zhu	Diao 531
Zhu	Diao 535
Zhu	Haq
Zhu	Lee
Zhu	Cai
Zhu	Tahan
Zhu	Menahem
Zhu	Moskovitch
Zhu	Niemela
Zhu	Kennedy
Zhu	Schultz
Zhu	Okano
Zhu	Kumar

Primary Reference	In Combination With
Zhu	Titonis
Zhu	Ramzan
Zhu	Diao 788
Zhu	McCorkendale
Zhu	Hsu
Zhu	Idses
Zhu	Okano 074
Zhu	Stokes
Zhu	Friedrichs
Zhu	Maloof
Zhu	Avasarala
Zhu	Ronen
Zhu	Karta
Zhu	Ravula
Zhu	Masud
Zhu	ThreatSeeker
Zhu	Next Generation Firewall
Zhu	ThreatSeeker + Kumar
Zhu	ThreatSeeker + Okano
Zhu	Okano + Kumar
Ramzan	Zhu
Ramzan	Hu
Ramzan	Diao 466

Primary Reference	In Combination With
Ramzan	Xuewen
Ramzan	Cheng
Ramzan	Wan
Ramzan	Diao 974
Ramzan	Chen
Ramzan	Diao 531
Ramzan	Diao 535
Ramzan	Haq
Ramzan	Lee
Ramzan	Cai
Ramzan	Tahan
Ramzan	Menahem
Ramzan	Moskovitch
Ramzan	Niemela
Ramzan	Kennedy
Ramzan	Schultz
Ramzan	Okano
Ramzan	Kumar
Ramzan	Titonis
Ramzan	Diao 788
Ramzan	McCorkendale
Ramzan	Hsu
Ramzan	Idses

Primary Reference	In Combination With
Ramzan	Okano 074
Ramzan	Stokes
Ramzan	Friedrichs
Ramzan	Maloof
Ramzan	Avasarala
Ramzan	Ronen
Ramzan	Karta
Ramzan	Ravula
Ramzan	Masud
Ramzan	ThreatSeeker
Ramzan	Next Generation Firewall
Ramzan	ThreatSeeker + Kumar
Ramzan	ThreatSeeker + Okano
Ramzan	Okano + Kumar
Ramzan	Schultz + ThreatSeeker
Ramzan	Schultz + Kumar
Ramzan	Schultz + Okano
Diao 788	Ramzan
Diao 788	Zhu
Diao 788	Hu
Diao 788	Diao 466
Diao 788	Xuwen
Diao 788	Cheng

Primary Reference	In Combination With
Diao 788	Wan
Diao 788	Diao 974
Diao 788	Chen
Diao 788	Diao 531
Diao 788	Diao 535
Diao 788	Haq
Diao 788	Lee
Diao 788	Cai
Diao 788	Tahan
Diao 788	Menahem
Diao 788	Moskovitch
Diao 788	Niemela
Diao 788	Kennedy
Diao 788	Schultz
Diao 788	Okano
Diao 788	Kumar
Diao 788	Titonis
Diao 788	McCorkendale
Diao 788	Hsu
Diao 788	Idses
Diao 788	Okano 074
Diao 788	Stokes
Diao 788	Friedrichs

Primary Reference	In Combination With
Diao 788	Maloof
Diao 788	Avasarala
Diao 788	Ronen
Diao 788	Karta
Diao 788	Ravula
Diao 788	Masud
Diao 788	ThreatSeeker
Diao 788	Next Generation Firewall
Diao 788	ThreatSeeker + Kumar
Diao 788	ThreatSeeker + Okano
Diao 788	Okano + Kumar
McCorkendale	Diao 788
McCorkendale	Ramzan
McCorkendale	Zhu
McCorkendale	Hu
McCorkendale	Diao 466
McCorkendale	Xuewen
McCorkendale	Cheng
McCorkendale	Wan
McCorkendale	Diao 974
McCorkendale	Chen
McCorkendale	Diao 531
McCorkendale	Diao 535

Primary Reference	In Combination With
McCorkendale	Haq
McCorkendale	Lee
McCorkendale	Cai
McCorkendale	Tahan
McCorkendale	Menahem
McCorkendale	Moskovitch
McCorkendale	Niemela
McCorkendale	Kennedy
McCorkendale	Schultz
McCorkendale	Okano
McCorkendale	Kumar
McCorkendale	Titonis
McCorkendale	Hsu
McCorkendale	Idses
McCorkendale	Okano 074
McCorkendale	Stokes
McCorkendale	Friedrichs
McCorkendale	Maloof
McCorkendale	Avasarala
McCorkendale	Ronen
McCorkendale	Karta
McCorkendale	Ravula
McCorkendale	Masud

Primary Reference	In Combination With
McCorkendale	ThreatSeeker
McCorkendale	Next Generation Firewall
McCorkendale	ThreatSeeker + Kumar
McCorkendale	ThreatSeeker + Okano
McCorkendale	Okano + Kumar
Hsu	McCorkendale
Hsu	Diao 788
Hsu	Ramzan
Hsu	Zhu
Hsu	Hu
Hsu	Diao 466
Hsu	Xuewen
Hsu	Cheng
Hsu	Wan
Hsu	Diao 974
Hsu	Chen
Hsu	Diao 531
Hsu	Diao 535
Hsu	Haq
Hsu	Lee
Hsu	Cai
Hsu	Tahan
Hsu	Menahem

Primary Reference	In Combination With
Hsu	Moskovitch
Hsu	Niemela
Hsu	Kennedy
Hsu	Schultz
Hsu	Okano
Hsu	Kumar
Hsu	Titonis
Hsu	Idses
Hsu	Okano 074
Hsu	Stokes
Hsu	Friedrichs
Hsu	Maloof
Hsu	Avasarala
Hsu	Ronen
Hsu	Karta
Hsu	Ravula
Hsu	Masud
Hsu	ThreatSeeker
Hsu	Next Generation Firewall
Hsu	ThreatSeeker + Kumar
Hsu	ThreatSeeker + Okano
Hsu	Okano + Kumar
Hsu	Schultz + ThreatSeeker

Primary Reference	In Combination With
Hsu	Schultz + Kumar
Hsu	Ramzan + ThreatSeeker
Hsu	Ramzan + Kumar
Idses	Hsu
Idses	McCorkendale
Idses	Diao 788
Idses	Ramzan
Idses	Zhu
Idses	Hu
Idses	Diao 466
Idses	Xuewen
Idses	Cheng
Idses	Wan
Idses	Diao 974
Idses	Chen
Idses	Diao 531
Idses	Diao 535
Idses	Haq
Idses	Lee
Idses	Cai
Idses	Tahan
Idses	Menahem
Idses	Moskovitch

Primary Reference	In Combination With
Idses	Niemela
Idses	Kennedy
Idses	Schultz
Idses	Okano
Idses	Kumar
Idses	Titonis
Idses	Okano 074
Idses	Stokes
Idses	Friedrichs
Idses	Maloof
Idses	Avasarala
Idses	Ronen
Idses	Karta
Idses	Ravula
Idses	Masud
Idses	ThreatSeeker
Idses	Next Generation Firewall
Idses	ThreatSeeker + Kumar
Idses	ThreatSeeker + Okano
Idses	Okano + Kumar
Okano 074	Idses
Okano 074	Hsu
Okano 074	McCorkendale

Primary Reference	In Combination With
Okano 074	Diao 788
Okano 074	Ramzan
Okano 074	Zhu
Okano 074	Hu
Okano 074	Diao 466
Okano 074	Xuewen
Okano 074	Cheng
Okano 074	Wan
Okano 074	Diao 974
Okano 074	Chen
Okano 074	Diao 531
Okano 074	Diao 535
Okano 074	Haq
Okano 074	Lee
Okano 074	Cai
Okano 074	Tahan
Okano 074	Menahem
Okano 074	Moskovitch
Okano 074	Niemela
Okano 074	Kennedy
Okano 074	Schultz
Okano 074	Okano
Okano 074	Kumar

Primary Reference	In Combination With
Okano 074	Titonis
Okano 074	Stokes
Okano 074	Friedrichs
Okano 074	Maloof
Okano 074	Avasarala
Okano 074	Ronen
Okano 074	Karta
Okano 074	Ravula
Okano 074	Masud
Okano 074	ThreatSeeker
Okano 074	Next Generation Firewall
Okano 074	ThreatSeeker + Kumar
Okano 074	Moskovitch + ThreatSeeker
Okano 074	Moskovitch + Kumar
Okano 074	Schultz + ThreatSeeker
Okano 074	Schultz + Kumar
Stokes	Okano 074
Stokes	Idses
Stokes	Hsu
Stokes	McCorkendale
Stokes	Diao 788
Stokes	Ramzan
Stokes	Zhu

Primary Reference	In Combination With
Stokes	Hu
Stokes	Diao 466
Stokes	Xuewen
Stokes	Cheng
Stokes	Wan
Stokes	Diao 974
Stokes	Chen
Stokes	Diao 531
Stokes	Diao 535
Stokes	Haq
Stokes	Lee
Stokes	Cai
Stokes	Tahan
Stokes	Menahem
Stokes	Moskovitch
Stokes	Niemela
Stokes	Kennedy
Stokes	Schultz
Stokes	Okano
Stokes	Kumar
Stokes	Titonis
Stokes	Friedrichs
Stokes	Maloof

Primary Reference	In Combination With
Stokes	Avasarala
Stokes	Ronen
Stokes	Karta
Stokes	Ravula
Stokes	Masud
Stokes	ThreatSeeker
Stokes	Next Generation Firewall
Stokes	ThreatSeeker + Kumar
Stokes	ThreatSeeker + Okano
Stokes	Okano + Kumar
Friedrichs	Stokes
Friedrichs	Okano 074
Friedrichs	Idses
Friedrichs	Hsu
Friedrichs	McCorkendale
Friedrichs	Diao 788
Friedrichs	Ramzan
Friedrichs	Zhu
Friedrichs	Hu
Friedrichs	Diao 466
Friedrichs	Xuewen
Friedrichs	Cheng
Friedrichs	Wan

Primary Reference	In Combination With
Friedrichs	Diao 974
Friedrichs	Chen
Friedrichs	Diao 531
Friedrichs	Diao 535
Friedrichs	Haq
Friedrichs	Lee
Friedrichs	Cai
Friedrichs	Tahan
Friedrichs	Menahem
Friedrichs	Moskovitch
Friedrichs	Niemela
Friedrichs	Kennedy
Friedrichs	Schultz
Friedrichs	Okano
Friedrichs	Kumar
Friedrichs	Titonis
Friedrichs	Maloof
Friedrichs	Avasarala
Friedrichs	Ronen
Friedrichs	Karta
Friedrichs	Ravula
Friedrichs	Masud
Friedrichs	ThreatSeeker

Primary Reference	In Combination With
Firedrichs	Next Generation Firewall
Friedrichs	ThreatSeeker + Kumar
Friedrichs	ThreatSeeker + Okano
Firedrichs	Okano + Kumar
Maloof	Friedrichs
Maloof	Stokes
Maloof	Okano 074
Maloof	Idses
Maloof	Hsu
Maloof	McCorkendale
Maloof	Diao 788
Maloof	Ramzan
Maloof	Zhu
Maloof	Hu
Maloof	Diao 466
Maloof	Xuewen
Maloof	Cheng
Maloof	Wan
Maloof	Diao 974
Maloof	Chen
Maloof	Diao 531
Maloof	Diao 535
Maloof	Haq

Primary Reference	In Combination With
Maloof	Lee
Maloof	Cai
Maloof	Tahan
Maloof	Menahem
Maloof	Moskovitch
Maloof	Niemela
Maloof	Kennedy
Maloof	Schultz
Maloof	Okano
Maloof	Kumar
Maloof	Titonis
Maloof	Avasarala
Maloof	Ronen
Maloof	Karta
Maloof	Ravula
Maloof	Masud
Maloof	ThreatSeeker
Maloof	Next Generation Firewall
Maloof	ThreatSeeker + Kumar
Maloof	ThreatSeeker + Okano
Maloof	Okano + Kumar
Avasarala	Maloof
Avasarala	Friedrichs

Primary Reference	In Combination With
Avasarala	Stokes
Avasarala	Okano 074
Avasarala	Idses
Avasarala	Hsu
Avasarala	McCorkendale
Avasarala	Diao 788
Avasarala	Ramzan
Avasarala	Zhu
Avasarala	Hu
Avasarala	Diao 466
Avasarala	Xuewen
Avasarala	Cheng
Avasarala	Wan
Avasarala	Diao 974
Avasarala	Chen
Avasarala	Diao 531
Avasarala	Diao 535
Avasarala	Haq
Avasarala	Lee
Avasarala	Cai
Avasarala	Tahan
Avasarala	Menahem
Avasarala	Moskovitch

Primary Reference	In Combination With
Avasarala	Niemela
Avasarala	Kennedy
Avasarala	Schultz
Avasarala	Okano
Avasarala	Kumar
Avasarala	Titonis
Avasarala	Ronen
Avasarala	Karta
Avasarala	Ravula
Avasarala	Masud
Avasarala	ThreatSeeker
Avasarala	Next Generation Firewall
Avasarala	ThreatSeeker + Kumar
Avasarala	ThreatSeeker + Okano
Avasarala	Okano + Kumar
Avasarala	Menahem + ThreatSeeker
Avasarala	Menahem + Kumar
Avasarala	Ramzan + ThreatSeeker
Avasarala	Ramzan + Kumar
Ronen	Avasarala
Ronen	Maloof
Ronen	Friedrichs
Ronen	Stokes

Primary Reference	In Combination With
Ronen	Okano 074
Ronen	Idses
Ronen	Hsu
Ronen	McCorkendale
Ronen	Diao 788
Ronen	Ramzan
Ronen	Zhu
Ronen	Hu
Ronen	Diao 466
Ronen	Xuewen
Ronen	Cheng
Ronen	Wan
Ronen	Diao 974
Ronen	Chen
Ronen	Diao 531
Ronen	Diao 535
Ronen	Haq
Ronen	Lee
Ronen	Cai
Ronen	Tahan
Ronen	Menahem
Ronen	Moskovitch
Ronen	Niemela

Primary Reference	In Combination With
Ronen	Kennedy
Ronen	Schultz
Ronen	Okano
Ronen	Kumar
Ronen	Titonis
Ronen	Karta
Ronen	Ravula
Ronen	Masud
Ronen	ThreatSeeker
Ronen	Next Generation Firewall
Ronen	ThreatSeeker + Kumar
Ronen	ThreatSeeker + Okano
Ronen	Okano + Kumar
Karta	Ronen
Karta	Avasarala
Karta	Maloof
Karta	Friedrichs
Karta	Stokes
Karta	Okano 074
Karta	Idses
Karta	Hsu
Karta	McCorkendale
Karta	Diao 788

Primary Reference	In Combination With
Karta	Ramzan
Karta	Zhu
Karta	Hu
Karta	Diao 466
Karta	Xuewen
Karta	Cheng
Karta	Wan
Karta	Diao 974
Karta	Chen
Karta	Diao 531
Karta	Diao 535
Karta	Haq
Karta	Lee
Karta	Cai
Karta	Tahan
Karta	Menahem
Karta	Moskovitch
Karta	Niemela
Karta	Kennedy
Karta	Schultz
Karta	Okano
Karta	Kumar
Karta	Titonis

Primary Reference	In Combination With
Karta	Ravula
Karta	Masud
Karta	ThreatSeeker
Karta	Next Generation Firewall
Karta	ThreatSeeker + Kumar
Karta	ThreatSeeker + Okano
Karta	Okano + Kumar
Ravula	Karta
Ravula	Ronen
Ravula	Avasarala
Ravula	Maloof
Ravula	Friedrichs
Ravula	Stokes
Ravula	Okano 074
Ravula	Idses
Ravula	Hsu
Ravula	McCorkendale
Ravula	Diao 788
Ravula	Ramzan
Ravula	Zhu
Ravula	Hu
Ravula	Diao 466
Ravula	Xuewen

Primary Reference	In Combination With
Ravula	Cheng
Ravula	Wan
Ravula	Diao 974
Ravula	Chen
Ravula	Diao 531
Ravula	Diao 535
Ravula	Haq
Ravula	Lee
Ravula	Cai
Ravula	Tahan
Ravula	Menahem
Ravula	Moskovitch
Ravula	Niemela
Ravula	Kennedy
Ravula	Schultz
Ravula	Okano
Ravula	Kumar
Ravula	Titonis
Ravula	Masud
Ravula	ThreatSeeker
Ravula	Next Generation Firewall
Ravula	ThreatSeeker + Kumar
Ravula	ThreatSeeker + Okano

Primary Reference	In Combination With
Ravula	Okano + Kumar
Masud	Ravula
Masud	Karta
Masud	Ronen
Masud	Avasarala
Masud	Maloof
Masud	Friedrichs
Masud	Stokes
Masud	Okano 074
Masud	Idses
Masud	Hsu
Masud	McCorkendale
Masud	Diao 788
Masud	Ramzan
Masud	Zhu
Masud	Hu
Masud	Diao 466
Masud	Xuewen
Masud	Cheng
Masud	Wan
Masud	Diao 974
Masud	Chen
Masud	Diao 531

Primary Reference	In Combination With
Masud	Diao 535
Masud	Haq
Masud	Lee
Masud	Cai
Masud	Tahan
Masud	Menahem
Masud	Moskovitch
Masud	Niemela
Masud	Kennedy
Masud	Schultz
Masud	Okano
Masud	Kumar
Masud	Titonis
Masud	ThreatSeeker
Masud	Next Generation Firewall
Masud	ThreatSeeker + Kumar
Masud	ThreatSeeker + Okano
Masud	Okano + Kumar
Masud	Ramzan + ThreatSeeker
Masud	Ramzan + Kumar
Masud	Schultz + ThreatSeeker
Masud	Schultz + Kumar

Forcepoint reserves the right to amend these Contentions and prior art combinations in light of new information that may arise from third parties related to additional computer security systems. The following list of references are also evidence of the knowledge of POSITA at the time of the alleged invention of the '869 Patent: Kumar, Okano, Titonis, Moskovitch, Menahem, Tahan, Cai, Schultz, Kennedy, Niemela, Lee, Haq, Diao 535, Diao 531, Chen, Diao 974, Wan, Cheng, Xuewen, Diao 466, Hu, Zhu, Ramzan, Diao 788, McCorkendale, Hsu, Ideses, Okano 074, Stokes, Friedrichs, Maloof, Avasarala, Ronen, Karta, Ravula, Masud, ThreatSeeker, and Next Generation Firewall.

One of ordinary skill in the art would be motivated to combine these references in the above combinations for at least the following reasons. One of ordinary skill in the art would have understood that each of these references are in the same field of endeavor, namely methods and devices relating to computer security. *See, e.g.*, Titonis at Abstract; Okano at Abstract; Kumar at Abstract; Moskovitch at [0057]; Menahem at [1483]; Tahan at 962; Cai at [0027]; Schultz at [0104]; Kennedy at [0015]; Niemela at [0009]; Lee at [0007]; Haq at [0022]; Diao 535 at 3:6-23; Diao 531 at 3:6-23, Chen at 2:16-53; Diao 974 at 2:21-33; Wan at 11:44-60; Cheng at 2:19-58; Xuewen at 9:42-10:43; Diao 466 at 3:32-49; Hu at 1:46-58; Zhu at 3:44-4:7; Ramzan at 4:19-40; Diao 788 at 10:9-27; McCorkendale at 10:50-11:3; Hsu at 2:22-39; Ideses at [0063]; Okano 074 at Abstract; Stokes at Abstract.; Friedrichs at Abstract; Maloof at Abstract.; Avasarala at Abstract; Ronen at Abstract; Karta at 3:7-42; Ravula at 27-28; Masud at 50; ThreatSeeker (Exhibit 869-H-37) at 4–5 (citing Websense Express (June 28, 2007) at 2; The Websense ThreatSeeker Network: Leveraging Websense HoneyGrid Computing (Sep. 4, 2008) at 2); Next Generation Firewall (Exhibit 869-H-38) at 3–4 (citing StoneGate 5.1: Firewall/VPN Reference Guide (Jan. 13, 2010)

at 26, 112; StoneGate Firewall/VPN Common Criteria Security Target Report (Jan. 23, 2009) at 17).

One of ordinary skill in the art would have recognized that these references are directed to addressing the same problem, in particular, improving computer security. *See, e.g.*, Titonis at Abstract; Okano at Abstract; Kumar at Abstract; Moskovitch at [0057]; Menahem at [1483]; Tahan at 962; Cai at [0027]; Schultz at [0104]; Kennedy at [0015]; Niemela at [0009]; Lee at [0007]; Haq at [0022]; Diao 535 at 3:6-23; Diao 531 at 3:6-23; Chen at 2:16-53; Diao 974 at 2:21-33; Wan at 11:44-60; Cheng at 2:19-58; Xuewen at 9:42-10:43; Diao 466 at 3:32-49; Hu at 1:46-58; Zhu at 3:44-4:7; Ramzan at 4:19-40; Diao 788 at 10:9-27; McCorkendale at 10:50-11:3; Hsu at 2:22-39; Ideses at [0063]; Okano 074 at Abstract; Stokes at Abstract.; Friedrichs at Abstract; Maloof at Abstract.; Avasarala at Abstract; Ronen at Abstract; Karta at 3:7-42; Ravula at 27-28; Masud at 50; ThreatSeeker (Exhibit 869-H-37) at 4–5 (citing Websense Express (June 28, 2007) at 2; The Websense ThreatSeeker Network: Leveraging Websense HoneyGrid Computing (Sep. 4, 2008) at 2); Next Generation Firewall (Exhibit 869-H-38) at 3–4 (citing StoneGate 5.1: Firewall/VPN Reference Guide (Jan. 13, 2010) at 26, 112; StoneGate Firewall/VPN Common Criteria Security Target Report (Jan. 23, 2009) at 17).

Further, the Asserted Claims of the '869 Patent contain merely a duplication of concepts known in the prior art and have no patentable significance given that no unexpected results occur—*i.e.* the patentee merely combines known prior art elements according to known methods to yield predictable results. For example, the prior art references describe methods of using “identifying static data points...indicative of either a harmful or benign executable file.” *See e.g.*, Kumar at 4:34-49; Okano at 7:46-58; Titonis at 12:1-23; Moskovitch at [0029]-[0030]; Menahem at [1483]; Tahan at 955; Cai at [0027]; Schultz at [0042]; Kennedy at [0017]; Niemela at [0011]; Lee at

[0009]; Haq at [0044]; Diao 535 at 3:48-56; Diao 531 at 1:63-67; Chen at 3:31-43; Diao 974 at 3:20-33; Wan at 8:51-9:1; Cheng at 5:7-31; Xuewen at 7:57-63; Diao 466 at 2:10-14; Hu at 3:63-4:2; Zhu at 4:28-39; Ramzan at 2:65-3:3; Diao 788 at 5:26-35; McCorkendale at 2:30-37; Hsu at 6:50-7:6; Ideses at [0089]; Okano 074 at [0074]-[0080]; Stokes at 3:61-4:5; Friedrichs at Abstract; Maloof at [0027]; Avasarala at [0037]; Ronen at 1:44-58; Karta at 3:43-4:9; Ravula at 47-48; Masud at 206; ThreatSeeker (Exhibit 869-H-37) at 6–7 (citing Websense Express (June 28, 2007) at 2; The Websense ThreatSeeker Network: Leveraging Websense HoneyGrid Computing (Sep. 4, 2008) at 2, 7, 9; The Web Isn't Fun Anymore: How Websense Technology Protects Against Internet-Based Threats (Aug. 1, 2007) at 4; Websense Product Overview (Jan. 10, 2007) at 4); Next Generation Firewall (Exhibit 869-H-38) at 4–5 (citing StoneGate 5.1: Firewall/VPN Reference Guide (Jan. 13, 2010) at 112; StoneGate Firewall/VPN Common Criteria Security Target Report (Jan. 23, 2009) at 17; StoneGate Firewall/VPN Common Criteria Security Target Report (Jan. 23, 2009) at 21).

The prior art references further describe a “associating the identified static data point with one of a plurality of categories of files” *See e.g.*, Titonis 45:31-36; Okano at 8:19-29; Kumar at 6:4-14; Moskovitch at [0029]-[0030]; Menahem at [1487] ; Tahan at 949; Cai at [0012]; Schultz at [0042]; Kennedy at [0023]; Niemela at [0067]; Lee at [0010]; Haq at [0044]; Diao 535 at 1:63-67; Diao 531 at 1:63-67; Chen at 3:31-43; Diao 974 at 3:20-33; Wan at 8:51-9:1; Cheng at 5:7-31; Xuewen at 7:57-63; Diao 466 at 4:44-62; Hu at 3:63-4:2; Zhu at 4:28-39; Ramzan at 2:65-3:3; Diao 788 at 5:26-35; McCorkendale at 2:30-37; Hsu at 6:50-7:6; Ideses at [0096]; Okano 074 at [0074]-[0080]; Stokes at 5:59-67; Friedrichs at 6:18-29; Maloof at [0027]; Avasarala at [0037]; Ronen at 6:46-60; Karta at 1:57-62; Ravula at 47-48; Masud at 206; ThreatSeeker (Exhibit 869-H-37) at 8–10 (citing Websense Express (June 28, 2007) at 2; The Websense ThreatSeeker

Network: Leveraging Websense HoneyGrid Computing (Sep. 4, 2008) at 8, 12; Websense Enterprise V6.2 and Web Security Suites “Aries” Requirements Document (May 01, 2005) at 6); Next Generation Firewall (Exhibit 869-H-38) at 6–7 (citing StoneGate 5.1: Firewall/VPN Reference Guide (Jan. 13, 2010) at 29, 114; The Evolution to the Next Generation Firewall: Meeting Today’s Critical Enterprise Network Demands (Feb. 22, 2010) at 10).

The prior art references further describe a “identifying an executable file to be evaluated.” *See e.g.*, Titonis at 4:58-67; Okano at 9:13-29; Kumar at 4:34-49; Moskovitch at [0033]; Menahem at [1487]; Tahan at 955; Cai at [0016]; Schultz at [0019]; Kennedy at [0004]; Niemela at [0062]; Lee at [0032]; Haq at [0064]; Diao 535 at 4:1-11; Diao 531 at 51:1-11; Chen at 4:49-61; Diao 974 at 3:20-24; Wan at 8:27-32; Cheng at 3:14-39; Xuwen at 4:65-5:1; Diao 466 at 4:26-36; Hu at 3:38-62; Zhu at 4:49-51; Ramzan at 5:1-12; Diao 788 at 4:13-15; McCorkendale at 1:29-42; Hsu at 3:43-51; Ideses at [0096]; Okano 074 at [0074]-[0080]; Stokes at 2:32-55; Friedrichs at 13:27-14:27; Maloof at [0027]; Avasarala at [0044]; Ronen at 1:59-2:8; Karta at 3:43-4:9; Ravula at 77; Masud at 211; ThreatSeeker (Exhibit 869-H-37) at 10–11 (citing Websense Express (June 28, 2007) at 2; The Websense ThreatSeeker Network: Leveraging Websense HoneyGrid Computing (Sep. 4, 2008) at 2; Websense Enterprise V6.2 and Web Security Suites “Aries” Requirements Document (May 01, 2005) at 10); Next Generation Firewall (Exhibit 869-H-38) at 8–9 (citing StoneGate 5.1: Firewall/VPN Reference Guide (Jan. 13, 2010) at 20, 112; The Evolution to the Next Generation Firewall: Meeting Today’s Critical Enterprise Network Demands (Feb. 22, 2010) at 10).

The prior art references further describe a “extracting a plurality of static data points from the executable file.” *See e.g.*, Titonis at 21:48-22:2; Okano at 9:13-41; Kumar at 5:43-52; Moskovitch at [0021]; Menahem at [1488]; Tahan at 949; Cai at [0012]; Schultz at [0021];

Kennedy at [0028]; Niemela at [0068]; Lee at [0032]; Haq at [0018]; Diao 535 at 4:1-11; Diao 531 at 4:1-11; Chen at 3:31-43; Diao 974 at 3:21-26; Wan at 4:34-40; Cheng at 3:45-67; Xuewen at 5:49-55; Diao 466 at 4:26-30; Hu at 7:13-29; Zhu at 1:36-41; Ramzan at 2:56-65; Diao 788 at 7:33-38; McCorkendale at 1:29-42; Hsu at 3:30-42; Ideses at [0089]; Okano 074 at [0074]-[0080]; Stokes at 4:37-50; Friedrichs at 3:4-16; Maloof at [0027]; Avasarala at [0037]; Ronen at 1:44-58; Karta at 3:43-4:9; Ravula at 40; Masud at 211; ThreatSeeker (Exhibit 869-H-37) at 11–13 (citing The Websense ThreatSeeker Network: Leveraging Websense HoneyGrid Computing (Sep. 4, 2008) at 8; Websense Email Security Suite: DataSheet (Sept. 16, 2008) at 2); Next Generation Firewall (Exhibit 869-H-38) at 9–10 (citing StoneGate Firewall/VPN Common Criteria Security Target Report (Jan. 23, 2009) at 10; The Evolution to the Next Generation Firewall: Meeting Today’s Critical Enterprise Network Demands (Feb. 22, 2010) at 10).

The prior art references further describe a “generating a feature vector from the plurality of static data points.” See e.g., Titonis at 29:30-45; Okano at 9:13-41; Kumar at 4:50-5:3; Moskovitch at [0034]; Menahem at [1487]; Tahan at 951; Cai at [0025]; Schultz at [0115]; Kennedy at [0027]; Niemela at [0067]; Lee at [0008]; Haq at [0085]; Diao 535 3:24-34; Diao 531 at 3:24-34; Chen at 3:6-14; Diao 974 at 3:52-4:1; Wan at 5:27-45; Cheng at 4:1-6; Xuewen at 5:15-19; Diao 466 at 4:26-30; Hu at 7:30-40; Zhu at 1:36-41; Ramzan at 2:65-3:3; Diao 788 at 5:26-35; McCorkendale at 7:15-32; Hsu at 4:33-41; Ideses at [0044]; Okano 074 at [0090]-[0091]; Stokes at 4:37-50; Friedrichs at 6:57-64; Maloof at [0040]; Avasarala at [0050]; Ronen at 1:59-2:8; Karta at 9:13-10:52; Ravula at 40; Masud at 91; ThreatSeeker (Exhibit 869-H-37) at 10–13 (citing Websense Product Overview (Jan. 10, 2007) at 3; The Websense ThreatSeeker Network: Leveraging Websense HoneyGrid Computing (Sep. 4, 2008) at 13–16; The Web Isn’t Fun Anymore: How Websense Technology Protects Against Internet-Based Threats (Aug. 1, 2007) at

3); Next Generation Firewall (Exhibit 869-H-38) at 11–13 (citing StoneGate Firewall/VPN Common Criteria Security Target Report (Jan. 23, 2009) at 17, 21, 27; StoneGate 5.1: Firewall/VPN Reference Guide (Jan. 13, 2010) at 112).

The prior art references further describe a “evaluating the feature vector using a machine learning model” *See e.g.*, Titonis at 25:56-26:35; Okano at 8:62-9:11; Kumar at 8:21-28; Moskovitch at [0046]; Menahem at [1484]; Tahan at 951; Cai at [0025]; Schultz at [0042]; Kennedy at [0027]; Niemela at [0067]; Lee at [0030]; Haq at [0085]; Diao 535 at 3:56-67; Diao 531 at 3:56-67; Chen at 3:20-27; Diao 974 at 4:8-14; Wan at 7:32-48; Cheng at 6:43-52; Xuwen at 5:22-28; Diao 466 at 4:26-34; Hu at 3:63-4:2; Zhu at 4:14-23; Ramzan at 3:14-17; Diao 788 at 6:14-19; McCorkendale at 1:29-42; Hsu at 7:7-18; Ideses at [0096]; Okano 074 at [0107]-[0109]; Stokes at 1:17-33; Friedrichs at 6:18-29; Maloof at [0011]; Avasarala at [0036]; Ronen at 1:59-2:8; Karta at 10:1-14; Ravula at 38; Masud at 77; ThreatSeeker (Exhibit 869-H-37) at 17–18 (citing The Websense ThreatSeeker Network: Leveraging Websense HoneyGrid Computing (Sep. 4, 2008) at 9); Next Generation Firewall (Exhibit 869-H-38) at 14–15 (citing StoneGate Firewall/VPN Common Criteria Security Target Report (Jan. 23, 2009) at 17; StoneGate 5.1: Firewall/VPN Reference Guide (Jan. 13, 2010) at 112, 114).

Other examples of these concepts are cited in the attached charts for the above references. *See* Exs. 869-H-1 through 869-H-38. It would have been known and simple to take a prior art for malware detection by comparison with similar objects, and it would have been obvious to a POSITA to try this. *Id.* It would have also yielded predictable results in the context of improving computer security. *Id.*

Forcepoint is not aware of any secondary considerations supporting non-obviousness of the '869 Patent claims. To the extent Plaintiffs seek to introduce any alleged secondary considerations in the future, Forcepoint reserves the right to respond at that time.

F. Invalidity Under Section 112

Pursuant to Section II, Paragraph 4 of the Order, Forcepoint provides an identification of the limitations of the '869 Patent that are invalid based on indefiniteness under 35 U.S.C. § 112(b), or enablement or written description under 35 U.S.C. § 112(a). These Contentions are being proffered without the full benefit of expert disclosure or discovery.

Asserted Claims 18, 32, and 46 of the '869 Patent (and all claims which depend from these claims) are indefinite, and thus invalid. “[A] patent is invalid for indefiniteness if its claims, read in light of the specification delineating the patent, and the prosecution history, fail to inform, with reasonable certainty, those skilled in the art about the scope of the invention.” *Nautilus, Inc. v. Biosig Instruments, Inc.*, 572 U.S. 898, 901 (2014). For example, as applied in Plaintiffs’ Infringement Contentions, the terms “selectively turned on or off”, “predetermined range”, “harmful [executable] file[s]”, “benign [executable] file[s]”, “classifier”, “one or more categories of files”, “without decrypting or unpacking the executable file”, “artificial neural network”, “user request for a file download” “evaluating the feature vector using a machine learning model”, “machine learning model”, “detected condition”, and “harmful” are indefinite because each of these phrases not only is subjective but also does not have a meaning that can be clearly determined from the patent, and thus fails to put the public on notice of what is and is not covered by these claims.

Asserted Claims 18, 32, and 46 of the '869 Patent (and all claims which depend from these claims) of the '869 Patent are invalid under § 112 ¶ 1, because the specification as filed does not contain a sufficient written description supporting those claims. In particular, the patent disclosure

would not lead a person of ordinary skill in the art to understand that the named inventor had possession of the purported inventions as claimed and in view of Plaintiffs' contentions. For example, Asserted Claims 18, 32, and 46 (and all claims that depend from these claims) fail to satisfy the requirements of 35 U.S.C. § 112 for at least the following reasons: the '869 Patent fails to provide an adequate written description of the phrases "selectively turned on or off", "predetermined range", "harmful [executable] file[s]", "benign [executable] file[s]", "classifier", "generating a feature vector from a plurality of static data points", "classifier trained to classify the static data points", "files known to fit into one of the plurality of categories of files", "one or more categories of files", "plurality of static data points are extracted without decrypting or unpacking the executable file", "determination of whether the executable file is harmful", "classifying the executable file as harmful", "artificial neural network", "user request for a file download", "evaluating the feature vector using a machine learning model", "machine learning model", "detected condition", and "harmful".

A more detailed basis for the above indefiniteness, written description, and enablement defenses may be set forth in any expert report(s) on invalidity to be served on Plaintiffs in accordance with the Court's Scheduling Order.

G. Invalidity Under Section 101

Pursuant to Section II, Paragraph 4 of the Order, Forcepoint provides an identification of the claims of the '869 Patent they contend are directed to ineligible subject matter under AIA 35 U.S.C. § 101. These Contentions are being proffered without expert disclosure or discovery.

Each Asserted Claim of the '869 Patent is directed to ineligible subject matter under 35 U.S.C. § 101. First, the Asserted Patent Claims of the '869 Patent are directed to the abstract idea of, for example, identifying, extracting and classifying data based on known data points. Such a process does not go beyond routine mental processes of data classification based on pre-existing

criteria. *See, e.g.*, '869 Patent at claims 18, 46. For example, the specification of the '869 confirms that the Asserted Claims are directed to basic concepts of identifying, extracting, and classifying data. *See, e.g., id.* at 4:29–34 (“To classify executable files into one of the above identified categories, the knowledge component 102 collects static data on a large variety of executable files (e.g., PE files.)”); *id.* at 5:8–11 (“In examples, the collected data on the executable files is analyzed to identify static data points that may indicate one of a malicious file, a benign file or a potentially unwanted file.”); *id.* at 5:11–47 (“For instance, the knowledge component 102 may employ one or more programming operations to identify static data points for collection, and to associate the static data points with one of the categories of files (e.g., malicious, benign or potentially unwanted). Programming operations utilized by the knowledge component 102 include operations to collect file data (e.g., executable files or data points from executable files), parse the file data, and store extracted data points.”).

Second, the Asserted Claims of the '869 Patent do not contain any inventive concept as they combine standard, generic, and well-known components in a conventional way to arrive at the claimed invention. The '869 Patent describes identifying, extracting and classifying data based on known data points using well-known devices “such as a computer, a client device . . . and/or any other electronic devices[.]” *Id.* at 3:17–21.

Considered individually or as an ordered combination, the claim limitations recite nothing more than the abstract idea of identifying, extracting and classifying data based on known data points. Simply identifying an overarching desirable outcome (“threat detection of executable files”) without specifying any technical improvements over the prior art to achieve that outcome does not rise to the level of an inventive and, thus, patent-eligible concept. *See Intell. Ventures I LLC v. Erie Indem. Co.*, 850 F.3d 1315, 1330–32 (Fed. Cir. 2017) (“The recited use of a mobile

interface and pointers to retrieve user information evidences nothing more than a ‘generic computer implementation’ of the abstract idea that is insufficient to transform a patent-ineligible abstract idea into a patent-eligible invention.”); *Intell. Ventures I LLC v. Capital One Bank (USA)*, 792 F.3d 1363, 1367–68 (Fed. Cir. 2015) (claims directed to internet-based communications recite generic computer components and do not claim inventive concepts). Moreover, the prior art cited throughout Forcepoint’s Contentions, as well as the patents themselves and the prior art cited therein, demonstrate that each claim element in every Asserted Claim is directed to well-understood, routine, and conventional computer security components and techniques. The remaining Asserted Claims merely apply those conventional and generic computer components and techniques in a selected physical or technical environment—an environment where they had already long been used by those of ordinary skill as the prior art referenced herein reflects. Thus, the Asserted Claims of the ’869 Patent fail to add anything to the underlying abstract idea sufficient to transform them into patent-eligible subject matter.

Furthermore, at least under Plaintiffs’ apparent infringement theory, as set forth in their Infringement Contentions, the Asserted Claims of the ’869 Patent are ineligible because they would preempt the entire field of threat detection.

This ineligibility contention is based in whole or in part on Forcepoint’s present understanding of the Asserted Claims of the ’869 Patent, their current construction of the claims, and/or Plaintiffs’ apparent construction of the claims in their current Infringement Contentions. Forcepoint is not adopting Plaintiffs’ apparent claim construction, nor admitting to the accuracy of any particular claim construction. To the extent that Plaintiffs’ apparent claim construction or applications thereof are reflected in this Contention, nothing herein should be construed as an admission that Forcepoint agrees with Plaintiffs’ apparent claim construction or Plaintiffs’

application of that claim construction in Plaintiffs' current Infringement Contentions. Further, claim construction is not necessary to determine that the Asserted Claims of the '869 Patent are ineligible.

Forcepoint's Contentions regarding ineligibility under 35 U.S.C. § 101 may be based on Plaintiffs' allegations of infringement. Forcepoint does not necessarily agree with the interpretations set forth in Plaintiffs' Infringement Contentions and thus this ineligibility contention is not an admission that the accused products meet any particular claim element or infringe the Asserted Claim. In addition, nothing in this ineligibility contention should be interpreted as a position about whether any portion of the Asserted Claims are limiting or not. Further, by submitting this ineligibility contention, Forcepoint does not waive and hereby expressly reserves its right to raise invalidity defenses including, but not limited, to defenses under 35 U.S.C. §§ 102, 103, and/or 112.

Discovery in this case is ongoing and, accordingly, this ineligibility contention is not to be considered final. Forcepoint reserves all rights to revise, amend, or supplement this ineligibility claim at a later date as discovery progresses, if the Court issues further claim construction rulings, or if Plaintiffs amend their Infringement Contentions.

XI. DOCUMENT PRODUCTION

Pursuant to Section II, Paragraph 4 of the Order, Forcepoint states that (1) all prior art related to these Contentions and (2) technical documents, excluding source code, within Forcepoint's possession, sufficient to show the operation of the accused product(s) were either already produced (e.g., at FP_WR00006352 - FP_WR00017692 and FP_WR00030916 - FP_WR00034239) or are being produced concurrently with service of these Contentions at FP_WR000586274 - FP_WR000599749. Forcepoint's will make source code available for inspection in the Austin office of Kirkland & Ellis.

Dated: November 1, 2023

Respectfully submitted,

/s/ Kat Li

Kat Li (SBN 24070142)

kat.li@kirkland.com

Nadia E. Haghighatian (SBN 24087652)

nadia.haghighatian@kirkland.com

KIRKLAND & ELLIS LLP

401 Congress Avenue

Austin, TX 78701

Telephone: (512) 678-9100

Facsimile: (512) 678-9101

Adam R. Alper (admitted *pro hac vice*)

aalper@kirkland.com

Akshay S. Deoras (admitted *pro hac vice*)

adeoras@kirkland.com

Laura Ashley Harris (admitted *pro hac vice*)

lauraashley.harris@kirkland.com

KIRKLAND & ELLIS LLP

555 California Street

San Francisco, CA 94104

Telephone: (415) 439-1400

Facsimile: (415) 439-1500

Michael W. De Vries (admitted *pro hac vice*)

michael.devries@kirkland.com

KIRKLAND & ELLIS LLP

555 South Flower Street

Los Angeles, CA 90071

Telephone: (213) 680-8400

Facsimile: (213) 680-8500

Leslie M. Schmidt (admitted *pro hac vice*)

leslie.schmidt@kirkland.com

KIRKLAND & ELLIS LLP

601 Lexington Ave.

New York, NY 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

Attorneys for Forcepoint LLC

CERTIFICATE OF SERVICE

I hereby certify that counsel of record are being served on November 1, 2023, with a copy of this document, along with all exhibits and attachments, via email.

/s/ Kat Li

Kat Li