

EX 1014

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Netskope, Inc.

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO DIVISION**

15 NETSKOPE, INC.,

16 Plaintiff,

17 v.

18 FORTINET, INC.,

19 Defendant.  
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Case No. 4:25-cv-02360-HSG

**PLAINTIFF NETSKOPE, INC.'S  
IDENTIFICATION OF PROPOSED  
CLAIM TERMS FOR CONSTRUCTION  
PURSUANT TO PATENT LOCAL  
RULE 4-1**

1     **I.     INTRODUCTION**

2           Pursuant to Rule 4-1(a) of the Patent Local Rules, Plaintiff Netskope, Inc. (“Netskope”)  
3 hereby provides its list of proposed terms for construction with respect to the asserted claims of  
4 U.S. Patent Nos. 8,356,336 (the “’336 Patent”), 8,543,710 (the “’710 Patent”), 8,117,639 (the “’639  
5 Patent”), 8,224,983 (the “’983 Patent”), 8,327,426 (the “’426 Patent”), 7,593,936 (the “’936  
6 Patent”), 8,397,282 (the “’282 Patent”), 8,661,153 (the “’153 Patent”), and 8,635,697 (the “’697  
7 Patent”) (collectively “Netskope’s Patents”). The asserted claims of Netskope’s Patents are those  
8 identified by Netskope in Netskope’s Preliminary Infringement Contentions Pursuant to Patent  
9 Local Rule 3-2 served on July 1, 2025.

10          Based on its investigation to date, Netskope hereby identifies a list of claim terms in the  
11 asserted claims of Netskope’s Patents that Netskope contends should be construed by the Court.  
12 By including a term in the following list, Netskope does not necessarily contend that such term  
13 should be given a meaning other than its ordinary meaning or that Netskope believes at this time  
14 that the meaning of the term will necessarily be in dispute. Netskope also reserves the right to revise  
15 its contentions regarding claim terms, including elements identified as being governed by 35 U.S.C.  
16 § 112(6), in view of Fortinet’s contentions on such issues and as the case proceeds.

17          Netskope reserves the right to seek construction of constituent portion(s) of an identified  
18 term if the parties are unable to reach agreement regarding the entire identified term. Netskope’s  
19 investigation is ongoing, and Netskope has not received Fortinet’s list of terms and claim elements  
20 for construction. Accordingly, Netskope reserves the right to amend, modify, or supplement this  
21 disclosure as appropriate. Netskope further reserves the right to propose constructions for claim  
22 terms identified by Fortinet.

23     **II.    IDENTIFICATION OF PROPOSED TERMS FOR CONSTRUCTION**

24           Netskope identifies the following proposed terms for construction.

25           The ’336 Patent:

- 26           1.       “redirecting the browser application running on the client device associated  
27                   with the anonymous user back to the pre-authentication capture destination  
28                   hosted on the first server computer in the shared network” (claims 6, 13)

- 1                   2.       “second request” (claims 5-6, 12-14, 19-20)

2       The '710 Patent:

- 3                   1.       “network packet traversal” (claim 19)
- 4                   2.       “network segment” (claims 1, 6, 13, 15, 20)
- 5                   3.       “evaluating network traffic emanating from the client device after the client
- 6                               device has been scanned and abnormal behavior has been removed,
- 7                               mitigated or rendered inert” (claim 17)

8       The '639 Patent:

- 9                   1.       “global stage” (claims 3, 12, 19)

10       The '983 Patent:

11                   None

12       The '426 Patent:

- 13                   1.       “target service” (claims 2, 5)
- 14                   2.       “second redirection” (claim 5)
- 15                   3.       “authentication response” (claims 1, 3, 4, 6)

16       The '936 Patent:

- 17                   1.       “inserting rules into the rule set of the adaptive reference model to augment
- 18                               or override rules of the rule set automatically generated from the
- 19                               snapshots” / “insert rules into the rule set of the adaptive reference model
- 20                               to augment or override rules of the rule set automatically generated from
- 21                               the snapshots” (claims 8, 22)
- 22                   2.       “cluster layer” (claim 10)
- 23                   3.       “generic response” (claims 3-4, 14-15)

24       The '282 Patent:

- 25                   1.       “conditioning the packet” (claims 7, 8, 19, 32)

26       The '153 Patent:

- 27                   1.       “default value” (claims 3, 4, 12)
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2. “programmatic user” (claims 7, 14, 24)

The '697 Patent:

1. “wherein the alert is cleared when all computing devices associated with the access device and the computing device having the at least one of the first OS ID or second OS ID have accessed the remediation portal” (claim 6)

DATED: August 29, 2025

**Perkins Coie LLP**

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1 **CERTIFICATE OF SERVICE**

2 I, Patrick Kelly, declare:

3 I am a citizen of the United States and employed in San Diego, California. I am over the  
4 age of eighteen years and not a party to the within-entitled action. My business address is 11452  
5 El Camino Real, Suite 300, San Diego, CA 92130-2080. On August 29, 2025, I served a copy of  
6 the within document(s):

7 **PLAINTIFF NETSKOPE, INC.'S IDENTIFICATION OF PROPOSED CLAIM TERMS**  
8 **FOR CONSTRUCTION PURSUANT TO PATENT LOCAL RULE 4-1**

9 ☒ by transmitting via e-mail or electronic transmission the document(s)  
10 listed above to the person(s) at the e-mail address(es) set forth below.

11 Ryan Kiyoto Iwahashi  
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Attorneys for Fortinet, Inc.

21 I declare that I am employed in the office of a member of the bar of this court at whose  
22 direction the service was made.

23 Executed on August 29, 2025, at San Diego, California.

24 /s/ Patrick M. Kelly  
25 Patrick Kelly  
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