UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SOPHOS LIMITED AND SOPHOS INC., Petitioners

v.

FORTINET, INC., Patent Owner

U.S. Patent No. 8,205,251 Filing Date: May 24, 2011 Issue Date: June 19, 2012

Title: Policy-Based Content Filtering

Inter Partes Review No.: (Unassigned)

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,205,251 UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. §§ 42.1-80, 42.100-123



TABLE OF CONTENTS

		P	age		
I.	COMPLIANCE WITH FORMAL REQUIREMENTS1				
	A.	Mandatory Notices Under 37 C.F.R. §§ 42.8(b)(1)-(4)	1		
		1. Real Party-In-Interest	1		
		2. Related Matters	1		
		3. Lead and Backup Counsel	1		
		4. Service Information	2		
	B.	Proof of Service on the Patent Owner	2		
	C.	Power of Attorney	2		
	D.	Standing	2		
	E.	Fees	3		
II.	STA	TEMENT OF PRECISE RELIEF REQUESTED	3		
III.	FUL	L STATEMENT OF REASONS FOR REQUESTED RELIEF	4		
	A.	Technology Background	4		
	B.	Summary of the '251 Patent	4		
	C.	Person of Ordinary Skill in the Art	5		
	D.	Claim Construction	5		
	E.	Ground 1: Claims 1, 6, 12, 17, 18, 26, 27, 29, & 31 are Obvious under 35 U.S.C. § 103(a) (pre-AIA) in view of Taylor	6		
	F.	Ground 2: Claims 1, 12, 17, 18, 26, 27 and 29 are Obvious under 35 U.S.C. § 103(a) (pre-AIA) in view of Sonnenberg	27		
	G.	Ground 3: Claims 9, 22, & 32 are Obvious under 35 U.S.C. § 103(a) (pre-AIA) in light of Taylor in view of Astaro	47		
	Н.	Ground 4: Claims 6, 9, 22, 31, & 32 are Obvious under 35 U.S.C. § 103(a) (pre-AIA) in light of Sonnenberg in view of Astaro	53		
IV.	CON	NCLUSION	59		



EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 8,205,251
1002	File history of U.S. Patent No. 8,205,251
1003	Fortinet, Inc.'s Answer, Affirmative Defenses, and Counterclaims,
	Sophos Ltd. et al v. Fortinet, Inc., No. 14-cv-00100-GMS (D.Del.)
1004	Sophos Ltd. et al v. Fortinet, Inc. Proof of Service
1005	U.S. Patent No. 8,205,251, Infringement Contentions Pursuant to
	Section 4(C)
1006	U.S. Patent No. 6,728,885 B1
1007	U.S. Patent No. 7,076,650 B1
1008	Astaro Security Linux V5 WebAdmin User Manual
1009	Declaration of Charles P. Pfleeger
1010	U.S. Patent No. 6,167,445
1011	U.S. Patent No. 6,574,661 B1
1012	U.S. Patent No. 6,606,708 B1
1013	U.S. Patent No. 7,284,267 B1
1014	U.S. Patent No. 7,171,440 B2
1015	U.S. Patent No. 5,835,726



Exhibit No.	Description
1016	Computer Networks 4 th edition, Andrew S. Tannenbaum, Prentice
	Hall, 2003
1017	Security in Computing 3 rd edition, Charles P. Pfleeger and Shari
	Lawrence Pfleeger, Prentice Hall, 2003
1018	Advanced Programming Techniques, Hughes, C., et al, Wiley, 1978
1019	"A Network Firewall," Ranum, M., Proceedings of the
	International Conference on Systems and Network Security and
	Management (SANS-1)", November 1992
1020	"A Toolkit and Methods for Internet Firewalls," Ranum, M. and
	Avolio, F., Proceedings Usenix Security Symposium, 1994
1021	"Robust TCP Stream Reassembly In the Presence of Adversaries,"
	Dharmapurikar, S. and Paxson, V., Proceedings Usenix Security
	Symposium, 2005
1022	"RFC 793 Transmission Control Protocol," Information Sciences
	Institute, University of Southern California, September 1981
1023	"Guidelines on Firewalls and Firewall Policy," NIST [National
	Institute of Standards and Technology] Special Publication 800-41,
	Jan 2002



Exhibit No.	Description
1024	"Six Dumbest Ideas in Computer Security," Ranum, M., Schneier
	on Security Blog, 9 September 2005. https://www.schneier.com/
	blog/archives/2005/09/marcus_ranums_t.html
1025	Cybersecurity Operations Handbook, Rittinghouse, J. and
	Hancock, W., Elsevier, 2003



DOCKET A L A R M

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

