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12 13	Attorneys for Defendant JUNIPER NETWORKS, INC.			
14				
15	UNITED STATES DISTRICT COURT			
16	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION			
17	FINJAN, INC.,) Case No. 3:17-cv-05659-WHA		
18	Plaintiff,) DEFENDANT JUNIPER NETWORKS,		
19	VS.	INC.'S MOTION FOR ADMINISTRATIVE RELIEF TO FILE		
20	JUNIPER NETWORKS, INC.,) DOCUMENTS UNDER SEAL		
21	Defendant.	Judge: Hon. William Alsup		
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1	NOTICE OF MOTION AND MOTION		
2	TO ALL PARTIES AND THEIR COUNSEL OF RECORD:		
3	PLEASE TAKE NOTICE THAT pursuant to Federal Rule of Civil Procedure 5.2(d) and		
4	Civil Local Rules 7-11 and 79-5, Defendant Juniper Networks, Inc. ("Juniper") respectfully moves		
5	the Court for an Order instructing the Clerk of the Court to file under seal the following		
6	documents:		
7	• Exhibit A to Juniper's Opposition to Finjan's Motion for Leave to File Second Amended		
8	Complaint (the "Brief") (excerpt from Finjan's Second Supplemental Objections and		
9	Responses to Defendant Juniper's First Set of Interrogatories (No. 6)); and		
10	• Exhibit C to the Brief (the claim charts for U.S. Patent No. 6,418,731 that were prepared		
11	by Finjan in 2015, and produced by Finjan to Juniper on May 22, 2018, bearing bates		
12	numbers FINJAN-JN303455-FINJAN-JN303458).		
13	This motion is based upon this Notice of Motion; the accompanying Memorandum of Points and		
14	Authorities; the Declaration of Sharon Song (the "Sealing Declaration"); such other evidence and		
15	arguments as the Court may consider; and all other matters of which the Court may take judicial		
16	notice.		
17	MEMORANDUM OF POINTS AND AUTHORITIES		
18	Pursuant to Federal Rule of Civil Procedure 5.2(d) and Civil Local Rules 7-11 and 79-5,		
19	Juniper hereby submits a request for an Order instructing the Clerk of the Court to file under seal		
20	the unredacted documents described above.		
21	Exhibit A to the Brief is an excerpt from Finjan's Second Supplemental Objections and		
22	Responses to Defendant Juniper's First Set of Interrogatories (No. 6) that has been designated		
23	confidential by Finjan.		
24	Exhibit C to the Brief are the claim charts for U.S. Patent No. 6,418,731 that were prepared		
25	by Finjan in 2015, and produced by Finjan to Juniper on May 22, 2018, bearing bates numbers		
26	FINJAN-JN303455-FINJAN-JN303458, that have been designated confidential by Finjan.		
27	As discussed in the Sealing Declaration, Exhibits A and C to the Brief were designated		
28	confidential by Finjan.		
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1	This request is narrowly tailored to seal only that material for which compelling reasons to			
2	seal have been established. The bases for this request are set forth in further detail in the			
3	accompanying Sealing Declaration. On these grounds, Juniper respectfully requests that the Court			
4	order sealed the redacted portions of the documents described above.			
5				
6	Dated: June 22, 2018 Respe	ectfully submitted,		
7	IREL	IRELL & MANELLA LLP		
8				
9	By:	/s/ Sharon Song		
10		Sharon Song Attorneys for Defendant		
11		Juniper Networks, Inc.		
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