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 13 JUNIPER NETWORKS, INC.

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 15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**
 17 **SAN FRANCISCO DIVISION**

18 FINJAN, INC.,)	Case No. 3:17-cv-05659-WHA
)	
19 Plaintiff,)	DECLARATION OF SHARON SONG IN
)	SUPPORT OF JUNIPER NETWORKS,
20 vs.)	INC.'S MOTION FOR
)	ADMINISTRATIVE RELIEF TO FILE
21 JUNIPER NETWORKS, INC.,)	DOCUMENTS UNDER SEAL
)	
22 Defendant.)	

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DECLARATION OF SHARON SONG

I, Sharon Song, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Juniper Networks, Inc. (“Juniper”) in the above-captioned matter. I am a member in good standing of the State Bar of California and have been admitted to practice before this Court. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I submit this declaration in support of Juniper’s July 2, 2018 Motion for Administrative Relief to File Documents Under Seal, which asks the Court for an Order to file under seal the following documents:

- Juniper’s unredacted Motion to Compel the notes used by Finjan’s Rule 30(b)(6) designee, John Garland, to refresh his recollection before his deposition (the “Motion”);
- Exhibit B to the Motion (excerpts of the deposition transcript of Finjan’s employee and Rule 30(b)(6) designee, John Garland);
- Unredacted Exhibit C to the Motion (a May 25, 2018 email from Rebecca Carson, counsel for Juniper, to Lisa Kobialka of Kramer Levin Naftalis & Frankel LLP, counsel for Finjan, including the letter attached thereto);
- Unredacted Exhibit D to the Motion (email exchanges between counsel for Finjan, Kramer Levin Naftalis & Frankel LLP, and counsel for Juniper).

3. The sealed portions of the documents described above that Juniper seeks to file under seal contain Finjan’s confidential information. In this declaration, I explain why these materials are sealable pursuant to Civil Local Rule 79-5.

4. Exhibit B to the Motion are excerpts of the deposition transcript of Finjan’s employee and Rule 30(b)(6) designee John Garland that have been designated confidential by Finjan.

5. The redacted portions of Exhibits C and D, and the redactions portions of the Motion reference or directly quote from Exhibit B, including discussion of information that has been designated confidential by Finjan.

1 6. Exhibit B; the redacted portions of Exhibits C and D; and the redacted portions of
2 the Motion were designated confidential by Finjan.

3 7. For these reasons, the documents described above should be filed under seal.

4 Executed on July 2, 2018, at Los Angeles, California.

5 I declare under penalty of perjury under the laws of the United States of America that the
6 foregoing is true and correct to the best of my knowledge.

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/s/ Sharon Song

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Sharon Song

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