

1 IRELL & MANELLA LLP  
 Jonathan S. Kagan (SBN 166039)  
 2 jkagan@irell.com  
 Joshua P. Glucoft (SBN 301249)  
 3 jglucoft@irell.com  
 Casey Curran (SBN 305210)  
 4 ccurran@irell.com  
 Sharon Song (SBN 313535)  
 5 ssong@irell.com  
 1800 Avenue of the Stars, Suite 900  
 6 Los Angeles, California 90067-4276  
 Telephone: (310) 277-1010  
 7 Facsimile: (310) 203-7199

8 Rebecca L. Carson (SBN 254105)  
 rcarson@irell.com  
 9 Kevin Wang (SBN 318024)  
 kwang@irell.com  
 10 840 Newport Center Drive, Suite 400  
 Newport Beach, California 92660-6324  
 11 Telephone: (949) 760-0991  
 Facsimile: (949) 760-5200

12 *Attorneys for Defendant*  
 13 JUNIPER NETWORKS, INC.

14  
 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,	)	<b>DECLARATION OF SHARON SONG ON</b>
		)	<b>BEHALF OF DEFENDANT JUNIPER</b>
20	vs.	)	<b>NETWORKS, INC. IN SUPPORT OF</b>
		)	<b>FINJAN, INC.’S ADMINISTRATIVE</b>
21	JUNIPER NETWORKS, INC.,	)	<b>MOTION TO FILE DOCUMENTS</b>
		)	<b>UNDER SEAL (DKT. NO. 132)</b>
22	Defendant.	)	
		)	
23		)	Judge: Hon. William Alsup
		)	
24		)	
		)	

25  
 26  
 27  
 28

**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 action. 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 Finjan, Inc.’s (“Finjan”) Administrative Motion to File Documents Under Seal (Dkt. No. 132), which moves the Court for an order to file under seal the following items related to Juniper’s confidential information:

- Exhibit 1 to the Declaration of Kristopher Kastens in Support of Finjan’s Reply In Support of Its Motion for Leave to File Second Amended Complaint (“Kastens Reply Decl.”);
- Exhibit 2 to the Kastens Reply Decl.; and
- Exhibit 3 to the Kastens Reply Decl.

In this declaration, I explain why the material cited above is sealable pursuant to Civil Local Rule 79-5 and provide additional facts in support of Finjan’s Administrative Motion to File Documents Under Seal to the extent that the administrative motion pertains to Juniper.

3. Exhibits 1 and 2 to the Kastens Reply Decl. described above contain highly confidential information produced by Juniper to Finjan. This information has never been made public and is related to the technical underpinnings and development of Juniper’s highly proprietary software—which includes much information that Juniper maintains as trade secrets. Juniper expends significant effort in maintaining the secrecy of its software architecture and development, including, for example, implementing strict screening procedures for visitors to its engineering campus. Public disclosure of essential nonpublic facts about Juniper’s software development could materially impair Juniper’s intellectual property rights and could cause serious competitive consequences to Juniper’s business positioning.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1           4.       Exhibit 3 to the Kastens Reply Decl. described above is comprised of excerpts from  
2 the deposition transcript of Raju Manthena as Juniper’s corporate designee pursuant to a subpoena  
3 served on Juniper by Finjan. The transcript reflects substantive discussion of the technical  
4 underpinnings and development of Juniper’s highly proprietary software—which contains much  
5 information that Juniper maintains as trade secrets. Juniper expends significant effort in  
6 maintaining the secrecy of its software architecture and development, including, for example,  
7 implementing strict screening procedures for visitors to its engineering campus. Public disclosure  
8 of essential nonpublic facts about Juniper’s software development could materially impair  
9 Juniper’s intellectual property rights and could cause serious competitive consequences to  
10 Juniper’s business positioning.

11           5.       In light of the foregoing, there are compelling reasons to seal the documents  
12 described above.

13           Executed on July 3, 2018 in Los Angeles, California.

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

16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

/s/ Sharon Song

Sharon Song