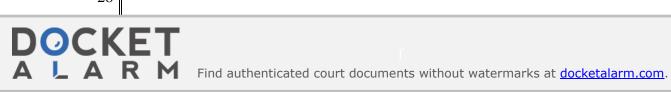
1 2	IRELL & MANELLA LLP Jonathan S. Kagan (SBN 166039) jkagan@irell.com	
3	Joshua P. Glucoft (SBN 301249) jglucoft@irell.com	
4	Casey Curran (SBN 305210) ccurran@irell.com	
5	Sharon Song (SBN 313535) ssong@irell.com	
6	1800 Avenue of the Stars, Suite 900 Los Angeles, California 90067-4276	
7	Telephone: (310) 277-1010 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	JUNIPÉR NETWORKS, INC.	
14	UNITED STATES DISTRICT COURT	
15	NORTHERN DISTRICT OF CALIFORNIA	
16	SAN FRANCISCO DIVISION	
17	FINJAN, INC.,	Case No. 3:17-cv-05659-WHA
18	Plaintiff,	DECLARATION OF SHARON SONG IN
19	vs.	SUPPORT OF JUNIPER NETWORKS, INC.'S MOTION FOR
20	JUNIPER NETWORKS, INC.,	ADMINISTRATIVE RELIEF TO FILE DOCUMENTS UNDER SEAL
21 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 12, 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 Reply In Support Of Motion For Summary Judgment Regarding Claim 1 Of U.S. Patent No. 6,804,780 (the "Brief"); and
 - Unredacted Exhibit 1 to the Brief (excerpts from the deposition transcript of plaintiff Finjan, Inc.'s expert Dr. Michael D. Mitzenmacher).
- 3. The sealed portions of the documents described above that Juniper seeks to file under seal contain confidential information of Juniper and Finjan. In this declaration, I explain why these materials are sealable pursuant to Civil Local Rule 79-5.
- 4. The redacted portions of the Brief other than in Section IV.B and the redacted portions of Exhibit 1 thereto include discussion of Juniper's confidential technical information related to Juniper's proprietary software. These portions contain sealable confidential information that relate to the technical underpinnings and development of Juniper's 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.
 - 5. The redacted portions in Section IV.B of the Brief contain confidential information

related to Juniper (and affiliates) and Finjan's confidential licensing and settlement negotiations that Juniper treats as highly confidential and makes substantial efforts not to disclose to the public. 6. For these reasons, the documents described above should be filed under seal. Executed on July 12, 2018, at Los Angeles, California. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. /s/ Sharon Song **Sharon Song**

