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12 *Attorneys for Defendant*  
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 )  
20 Plaintiff, ) **DECLARATION OF SHARON SONG IN**  
21 vs. ) **SUPPORT OF JUNIPER NETWORKS,**  
22 ) **INC.’S MOTION FOR**  
23 ) **ADMINISTRATIVE RELIEF TO FILE**  
24 ) **DOCUMENTS UNDER SEAL**  
25 )  
26 JUNIPER NETWORKS, INC., )  
27 )  
28 Defendant. )

**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

1 related to Juniper (and affiliates) and Finjan's confidential licensing and settlement negotiations  
2 that Juniper treats as highly confidential and makes substantial efforts not to disclose to the public.

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

4 Executed on July 12, 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.

7  
8 /s/ Sharon Song

9 Sharon Song  
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