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

14
 15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**
 17 **SAN FRANCISCO DIVISION**

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|----|-------------------------|---|--------------------------------------|
| 18 | FINJAN, INC., |) | Case No. 3:17-cv-05659-WHA |
| | |) | |
| 19 | Plaintiff, |) | DECLARATION OF SHARON SONG ON |
| | |) | BEHALF OF DEFENDANT JUNIPER |
| 20 | vs. |) | NETWORKS, INC. IN SUPPORT OF |
| | |) | FINJAN, INC.'S ADMINISTRATIVE |
| 21 | JUNIPER NETWORKS, INC., |) | MOTION TO FILE DOCUMENTS |
| | |) | UNDER SEAL (DKT. NO. 170) |
| 22 | Defendant. |) | |
| | |) | |
| 23 | |) | Judge: Hon. William Alsup |
| | |) | |
| 24 | |) | |
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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 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. 170; “Motion to Seal”), which moves the Court for an order to file under seal the following items related to Juniper:

- Select portions of pages 55-57 of Finjan’s Second Amended Complaint (the “SAC”); and
- Exhibits 33 and 34 to the SAC.

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

3. Exhibits 33 and 34 to the Second Amended Complaint described above are documents that have never been made public and contain information 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.

4. The select portions of pages 55-57 of the SAC described above cite or reference confidential technical information from Exhibits 33 and 34. This information has never been made public and is related to the technical underpinnings and development of Juniper’s highly

