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10 *Attorneys for Plaintiff*  
11 FINJAN, INC.

11 **IN THE UNITED STATES DISTRICT COURT**  
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN FRANCISCO DIVISION**

15 FINJAN, INC., a Delaware Corporation,

16 Plaintiff,

17 v.

18 JUNIPER NETWORKS, INC., a Delaware  
19 Corporation,

20 Defendant.

Case No.: 3:17-cv-05659-WHA

**DECLARATION OF CRISTINA  
MARTINEZ IN SUPPORT OF PLAINTIFF  
FINJAN, INC.'S ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS UNDER  
SEAL**

1 I, Cristina Martinez, declare:

2 1. I have personal knowledge of the facts stated herein.

3 2. I am an attorney at Kramer Levin Naftalis & Frankel LLP, counsel of record for Finjan,  
 4 Inc. (“Finjan”). I make this declaration in support of Finjan’s Administrative Motion to File Documents  
 5 Under Seal in connection with its Motion to Exclude Opinions of Defendant’s Damages Expert Dr.  
 6 Keith R. Ugone (“Motion”), pursuant to Civil Local Rules 79-5(d)-(e).

7 3. I have reviewed the following documents and confirmed that they are designated as  
 8 “Highly Confidential – Attorneys’ Eyes Only” by Juniper Networks, Inc. (“Juniper”) or Finjan pursuant  
 9 to the stipulated protective order in this litigation. Finjan relies on its and Juniper’s confidentiality  
 10 designations.

Identification of Documents to be Sealed	Entity that Designated the Information to be Confidential
Plaintiff Finjan Inc.’s Daubert of Dr. Ugone at page i, line 10, page 3, line 27, page 4, lines 1-3, 6, 8-9, 11-13, 17, 20-21, page 5, lines 1, 3, 5, 7-9, 11, 15, 19-21, page 6, lines 6, 26, page 7, lines 11-13, 15-16, 25-27, page 8, lines 1, 6, 15, page 9, lines 2-3, 5, 7, 17, page 11, lines 20-21, page 11, lines 5-12, 20, 27, page 13, lines 4-5, 7, page 14, lines 15-18, page 15, line 14	Finjan and/or Juniper
Declaration of Cristina Martinez in Support of Finjan Inc.’s Daubert of Dr. Ugone (“Martinez Daubert Declaration), Exs. 1, 3, and 8	Juniper
Martinez Daubert Declaration, Ex. 2	Finjan and/or Juniper
Martinez Daubert Declaration, Ex. 5	Finjan

21 4. This Administrative Motion to File Documents Under Seal should be granted because  
 22 there are compelling reasons to seal the identified documents. Finjan seeks to seal only those documents  
 23 and portions of documents that it and/or Juniper identified as containing confidential information  
 24 pursuant to the Protective Order.

25 5. Finjan seeks to seal Finjan’s Daubert of Dr. Ugone redacted portions at page i, line 10,  
 26 page 3, line 27, page 4, lines 1-3, 6, 8-9, 11-13, 17, 20-21, page 5, lines 1, 3, 5, 7-9, 11, 15, 19-21, page  
 27 6, lines 6, 26, page 7, lines 11-13, 15-16, 25-27, page 8, lines 1, 6, 15, page 9, lines 2-3, 5, 7, 17, page 11,

1 lines 20-21, page 11, lines 5-12, 20, 27, page 13, lines 4-5, 7, page 14, lines 15-18, page 15, line 14  
2 because, as set forth in the accompanying declaration of Cristina Martinez in Support of this  
3 Administrative Motion (“Martinez Sealing Declaration”), these portions contain information that Finjan  
4 or Juniper has designated as “Highly Confidential – Attorneys’ Eyes Only” Finjan relies on Juniper’s  
5 representations and confidentiality designations that such information is confidential and needs to be  
6 sealed.

7 6. Finjan seeks to seal Exhibits 1, 3, and 8 to the Martinez Declaration because, as set forth  
8 in the accompanying Martinez Sealing Declaration, these documents contain information that Juniper  
9 has designated as “Highly Confidential – Attorneys’ Eyes Only.”

10 7. Finjan seeks to seal Exhibit 2 to the Martinez Daubert Declaration because, as set forth in  
11 the accompanying Martinez Sealing Declaration, this document contains information that Finjan and/or  
12 Juniper has designated as “Highly Confidential – Attorneys’ Eyes Only.” Exhibit 2 contains, for  
13 example, the parties’ confidential financial information and license agreements with third-parties that are  
14 subject to third-party confidentiality obligations. Finjan relies on Juniper’s representations and  
15 confidentiality designations that such information is confidential and needs to be sealed.

16 8. Finjan seeks to seal Exhibit 5 to the Martinez Daubert Declaration because, as set forth in  
17 the accompanying Martinez Sealing Declaration, this document contains information that Finjan has  
18 designated as “Highly Confidential – Attorneys’ Eyes Only.” Exhibit 5 contains information regarding  
19 Finjan’s license with a third party that is subject to third-party confidentiality.

20  
21 I declare under penalty of perjury under the laws of the United States of America that each of the  
22 above statements is true and corrected. Executed on November 12, 2018, in New York, New York.

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24 By: /s/ Cristina Martinez  
25 Cristina Martinez  
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**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i), the filer attests that concurrence in the filing of this document has been obtained from the signatories above.

/s/ Kristopher Kastens  
Kristopher Kastens