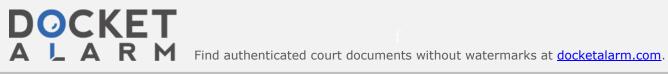
1	PAUL J. ANDRE (State Bar No. 196585)		
	pandre@kramerlevin.com		
2	Elon Robi Elin (Suite But 100, 191 101)		
3	JAMES HANNAH (State Bar No. 237978)		
4	jhannah@kramerlevin.com		
5	KRISTOPHER KASTENS (State Bar No. 254797) kkastens@kramerlevin.com		
5	KRAMER LEVIN NAFTALIS & FRANKEL LLP		
6	990 Marsh Road		
7	7 Menlo Park, CA 94025 Telephone: (650) 752-1700		
8	Facsimile: (650) 752-1760		
9	Attorneys for Plaintiff FINJAN, INC.		
10	Thorny, nec.		
11			
12	IN THE UNITED STATES DISTRICT COURT		
FOR THE NORTHERN DISTRICT OF CALIFORN		ISTRICT OF CALIFORNIA	
13	SAN FRANCISCO DIVISION		
14			
15	FINJAN, INC., a Delaware Corporation,	Case No.: 3:17-cv-05659-WHA	
16	Plaintiff,	DECLARATION OF CRISTINA	
17	riamini,	MARTINEZ IN SUPPORT OF PLAINTIFF	
	v.	FINJAN, INC.'S ADMINISTRATIVE	
18	JUNIPER NETWORKS, INC., a Delaware	MOTION TO FILE DOCUMENTS UNDER SEAL	
19	Corporation,		
20	D.f. J.		
21	Defendant.		
22			
23			
24			
25			
26			
	1		



I, Cristina Martinez, declare:

- 1. I have personal knowledge of the facts stated herein.
- 2. I am an attorney at Kramer Levin Naftalis & Frankel LLP, counsel of record for Finjan, Inc. ("Finjan"). I make this declaration in support of Finjan's Administrative Motion to File Documents Under Seal in connection with its Motion to Exclude Opinions of Defendant's Damages Expert Dr. Keith R. Ugone ("Motion"), pursuant to Civil Local Rules 79-5(d)-(e).
- 3. I have reviewed the following documents and confirmed that they are designated as "Highly Confidential Attorneys' Eyes Only" by Juniper Networks, Inc. ("Juniper") or Finjan pursuant to the stipulated protective order in this litigation. Finjan relies on its and Juniper's confidentiality designations.

Identification of Documents to be Sealed	Entity that Designated the Information to be
District Control of Daylor	Confidential
Plaintiff Finjan Inc.'s Daubert of Dr. Ugone at page i, line 10,	Finjan and/or Juniper
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	
Declaration of Cristina Martinez in Support of Finjan Inc.'s	Juniper
Daubert of Dr. Ugone ("Martinez Daubert Declaration), Exs.	
1, 3, and 8	
Martinez Daubert Declaration, Ex. 2	Finjan and/or Juniper
Martinez Daubert Declaration, Ex. 5	Finjan

- 4. This Administrative Motion to File Documents Under Seal should be granted because there are compelling reasons to seal the identified documents. Finjan seeks to seal only those documents and portions of documents that it and/or Juniper identified as containing confidential information pursuant to the Protective Order.
- 5. Finjan seeks to seal Finjan's Daubert of Dr. Ugone redacted portions 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 because, as set forth in the accompanying declaration of Cristina Martinez in Support of this Administrative Motion ("Martinez Sealing Declaration"), these portions contain information that Finjan or Juniper has designated as "Highly Confidential – Attorneys' Eyes Only" Finjan relies on Juniper's representations and confidentiality designations that such information is confidential and needs to be sealed.

- 6. Finjan seeks to seal Exhibits 1, 3, and 8 to the Martinez Declaration because, as set forth in the accompanying Martinez Sealing Declaration, these documents contain information that Juniper has designated as "Highly Confidential Attorneys' Eyes Only."
- 7. Finjan seeks to seal Exhibit 2 to the Martinez Daubert Declaration because, as set forth in the accompanying Martinez Sealing Declaration, this document contains information that Finjan and/or Juniper has designated as "Highly Confidential Attorneys' Eyes Only." Exhibit 2 contains, for example, the parties' confidential financial information and license agreements with third-parties that are subject to third-party confidentiality obligations. Finjan relies on Juniper's representations and confidentiality designations that such information is confidential and needs to be sealed.
- 8. Finjan seeks to seal Exhibit 5 to the Martinez Daubert Declaration because, as set forth in the accompanying Martinez Sealing Declaration, this document contains information that Finjan has designated as "Highly Confidential Attorneys' Eyes Only." Exhibit 5 contains information regarding Finjan's license with a third party that is subject to third-party confidentiality.

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

By: <u>/s/ Cristina Martinez</u>
Cristina Martinez



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