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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 HANNAH LEE IN  
SUPPORT OF PLAINTIFF FINJAN, INC.'S  
ADMINISTRATIVE MOTION TO FILE  
DOCUMENTS UNDER SEAL**

1 I, Hannah Lee, 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 Reply Brief In Support of Its Motion to Exclude Opinions of Damages  
6 Expert Dr. Keith R. Ugone (“Finjan’s Reply”), 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. For certain documents, Finjan relies on Juniper’s  
10 confidentiality designations.

Identification of Documents to be Sealed	Entity that Designated the Information to be Confidential
Finjan’s Reply Brief In Support of Its Motion to Exclude Opinions of Damages Expert Dr. Keith R. Ugone (“Finjan’s Reply”) at page 1, lines 20-21, page 2, line 22, page 3, lines 15-17, page 4, lines 9-10, 12, page 5, lines 3, 11-12, 16-21, page 6, lines 15-17, 23-27, page 7, lines 1-2, 4	Finjan or Juniper
Declaration of Kristopher Kastens in Support of Finjan’s Reply (“Kastens Declaration”), Ex. 1	Finjan or Juniper
Kasten Declaration, Ex. 3	Finjan
Kastens Declaration Ex. 4	Juniper

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

23 5. Finjan seeks to seal Finjan’s Reply at page 2, line 22, page 3, lines 15-17, and page 4,  
24 lines 9-10, 12, because these portions contain information that Finjan has designated as “Highly  
25 Confidential – Attorneys’ Eyes Only” and concerns its confidential licensing discussions and license  
26 agreement with third party subject to a confidentiality agreement. For the remaining redactions, Finjan  
27 relies on Juniper’s representations and confidentiality designations that such information is confidential

1 and needs to be sealed.

2 6. Finjan seeks to seal Exhibit 1 to the Kastens Declaration because this document contains  
3 information that Finjan has designated as “Highly Confidential – Attorneys’ Eyes Only.” Specifically,  
4 page 170 of this transcript contains information related to a confidential license agreement with a third  
5 party that is subject to third-party confidentiality obligations and Finjan maintains as confidential within  
6 its business. Public disclosure of this information would prejudice Finjan’s ability to engage in future  
7 licensing negotiations and be in violation of its confidentiality obligations to a third party. For the  
8 remaining redactions, Finjan relies on Juniper’s representations and confidentiality designations.

9 7. Finjan seeks to seal Exhibit 3 to the Kastens Declaration because it contains information  
10 that Finjan has designated as “Highly Confidential – Attorneys’ Eyes Only.” It is a confidential license  
11 agreement with a third party that is subject to third-party confidentiality obligations and Finjan maintains  
12 as confidential within its business. Public disclosure of this information would prejudice Finjan’s ability  
13 to engage in future licensing negotiations and be in violation of its confidentiality obligations to a third  
14 party.

15 8. Finjan seeks to seal Exhibit 4 to the Kastens Declaration because this document contains  
16 information that Juniper has designated as “Highly Confidential – Attorneys’ Eyes Only.” Finjan relies  
17 on Juniper’s representations and confidentiality designations that such information is confidential and  
18 needs to be sealed.

19  
20 I declare under penalty of perjury under the laws of the United States of America that each of the  
21 above statements is true and corrected. Executed on November 23, 2018, in San Francisco, California.

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23 By: /s/ Hannah Lee  
24 Hannah Lee  
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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