

1 IRELL & MANELLA LLP
 Jonathan S. Kagan (SBN 166039)
 2 jkagan@irell.com
 Joshua P. Glucoft (SBN 301249)
 3 jglucoft@irell.com
 Casey Curran (SBN 305210)
 4 ccurran@irell.com
 Sharon Song (SBN 313535)
 5 ssong@irell.com
 1800 Avenue of the Stars, Suite 900
 6 Los Angeles, California 90067-4276
 Telephone: (310) 277-1010
 7 Facsimile: (310) 203-7199

8 Rebecca L. Carson (SBN 254105)
 rcarson@irell.com
 9 Kevin Wang (SBN 318024)
 kwang@irell.com
 10 840 Newport Center Drive, Suite 400
 Newport Beach, California 92660-6324
 11 Telephone: (949) 760-0991
 Facsimile: (949) 760-5200

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

14
 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 Plaintiff,)	DECLARATION OF CASEY CURRAN IN SUPPORT OF JUNIPER NETWORKS, INC.'S MOTION FOR ADMINISTRATIVE RELIEF TO FILE DOCUMENTS UNDER SEAL
20 vs.)	
21 JUNIPER NETWORKS, INC.,)	
22 Defendant.)	

23
 24
 25
 26
 27
 28

DECLARATION OF CASEY CURRAN

I, Casey Curran, 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 November 23, 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 Juniper’s Motion to Exclude Opinions of Damages Expert Mr. Kevin M. Arst (the “Brief”);
- Exhibit 1 to the Brief (excerpts from the November 14, 2018 deposition transcript of Finjan’s expert Dr. Eric B. Cole);
- Exhibit 2 to the Brief (excerpts from the deposition transcript of Finjan’s expert Mr. Kevin M. Arst);
- Exhibit 3 to the Brief (excerpts from Juniper’s response to Finjan’s Interrogatory No. 11).

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. Exhibit 1 to the Brief is excerpts of the November 14, 2018 deposition transcript of Finjan’s expert Dr. Eric B. Cole that include discussion of Finjan and Juniper’s confidential financial, licensing, and/or technical information.

5. Exhibit 2 to the Brief is excerpts of the deposition transcript of Finjan’s expert Kevin M. Arst that include discussion of Finjan and Juniper’s confidential financial, licensing, and/or technical information.

6. Exhibit 3 to the Brief is excerpts Juniper’s response to Finjan’s Interrogatory Number 11 which includes discussion of Juniper’s confidential technical information.

1 7. The redacted portions of the Brief directly quote or reference the confidential
2 materials discussed above.

3 8. Exhibits 1, 2, and 3, and the redacted portions of the Brief contain sealable
4 confidential information that relate to the financial material concerning and technical
5 underpinnings and development of Juniper’s highly proprietary software—which includes much
6 information that Juniper maintains as trade secrets. Juniper expends significant effort in
7 maintaining the secrecy of its software architecture and development, including, for example,
8 implementing strict screening procedures for visitors to its engineering campus. Public disclosure
9 of essential nonpublic facts about Juniper’s software development could materially impair
10 Juniper’s intellectual property rights and could cause serious competitive consequences to
11 Juniper’s business positioning.

12 9. Exhibits 1 and 2 and the redacted portions of the Brief also contain sealable
13 confidential information that relate to Finjan’s confidential licensing information that Finjan
14 regularly treats as highly confidential and makes substantial efforts not to disclose to the public.

15 10. For these reasons, the documents described above should be filed under seal.

16 Executed on November 23, 2018, at Los Angeles, California.

17 I declare under penalty of perjury under the laws of the United States of America that the
18 foregoing is true and correct to the best of my knowledge.

19
20
21
22
23
24
25
26
27
28

/s/ Casey Curran

Casey Curran