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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 DEFENDANT JUNIPER
NETWORKS, INC.'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS UNDER
SEAL (DKT. NO. 236)**

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 Juniper’s Administrative Motion to Seal its Opposition to Finjan’s
 6 Motion to Exclude Opinions of Damages Expert Dr. Keith R. Ugone (Dkt. No. 236).

7 3. I have reviewed the following documents and confirmed that they are designated as
 8 “Highly Confidential – Attorneys’ Eyes Only” by Finjan and contain Finjan’s confidential information
 9 pursuant to the stipulated protective order in this litigation.

Identification of Documents to be Sealed	Entity that Designated the Information to be Confidential
Juniper’s Opposition to Finjan’s Motion to Exclude Opinions of Damages Expert Dr. Keith R. Ugone (“Juniper Opposition”) at page 2, ll. 19, 21, page 13, ll. 7-8, 19-21, 23-25, 28, page 14, ll.1-2, 5-6	Finjan

15 4. There are compelling reasons to seal the above-identified portions. Finjan seeks to seal
 16 only those portions that it identified as containing confidential information pursuant to the Protective
 17 Order and the Local Rules.

18 5. The above-identified portions of Juniper’s Opposition concern confidential business
 19 information regarding Finjan’s licensing negotiations and license agreements with third parties subject to
 20 confidentiality agreements. Finjan maintains such information as confidential within its ordinary course
 21 of business. Public disclosure of this information would prejudice Finjan’s ability to engage in future
 22 licensing negotiations and be in violation of its confidentiality obligations to third parties.

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

26 By: /s/ Hannah Lee
 27 Hannah Lee