

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 )  
20 Plaintiff, ) **DECLARATION OF SHARON SONG ON**  
21 vs. ) **BEHALF OF DEFENDANT JUNIPER**  
22 ) **NETWORKS, INC. IN SUPPORT OF**  
23 ) **FINJAN, INC.’S ADMINISTRATIVE**  
24 ) **MOTION TO FILE DOCUMENTS**  
25 ) **UNDER SEAL (DKT. NO. 238)**  
26 )  
27 )  
28 )

**DECLARATION OF SHARON SONG**

I, Sharon Song, 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 Finjan, Inc.’s (“Finjan”) Administrative Motion to File Documents Under Seal (Dkt. No. 238), which moves the Court for an order to file under seal the following items related to Juniper:

- Select portions of the Table of Contents and pages 1-12 and 15 of Finjan’s Opposition to Juniper’s Motion to Exclude Testimony of Mr. Kevin Arst (“Finjan’s Opposition”); and
- Exhibits 1, 3, 6, 7, 9, and 10 to the Declaration of Kristopher Kastens in Support of Finjan’s Opposition (“Kastens Decl.”).

In this declaration, I explain why the material cited above is sealable pursuant to Civil Local Rule 79-5 and provide additional facts in support of Finjan’s Administrative Motion to File Documents Under Seal to the extent that the administrative motion pertains to Juniper.

1. Exhibit 1 to the Kastens Decl. described above is the Expert Report of Finjan’s expert Dr. Eric Cole. This report contains sealable confidential information that relates to the financial information concerning and the technical underpinnings and development of Juniper’s highly proprietary software—which includes much information that Juniper maintains as trade secrets. Juniper expends significant effort in maintaining the secrecy of its software architecture and development, including, for example, implementing strict screening procedures for visitors to its engineering campus. Public disclosure of essential nonpublic facts about Juniper’s software development could materially impair Juniper’s intellectual property rights and could cause serious competitive consequences to Juniper’s business positioning. Exhibit 1 also contains sealable confidential information that relate to Juniper’s confidential licensing information that Juniper

1 regularly treats as highly confidential within its business and makes substantial efforts not to  
2 disclose to the public.

3           2.       Exhibit 3 to the Kastens Decl. described above is comprised of excerpts from  
4 Juniper's Second Supplemental Response to Finjan's Second Set of Interrogatories; and Exhibit 6  
5 to the Kastens Decl. described above is comprised of excerpts from Juniper's Response to Finjan's  
6 Fourth Set of Interrogatories. These excerpts contain financial information concerning and the  
7 technical underpinnings and development of Juniper's highly proprietary software—which  
8 includes much information that Juniper maintains as trade secrets. Juniper expends significant  
9 effort in maintaining the secrecy of its software architecture and development, including, for  
10 example, implementing strict screening procedures for visitors to its engineering campus. Public  
11 disclosure of essential nonpublic facts about Juniper's software development could materially  
12 impair Juniper's intellectual property rights and could cause serious competitive consequences to  
13 Juniper's business positioning.

14           3.       Exhibit 7 to the Kastens Decl. described above is comprised of excerpts from  
15 Finjan's Disclosure of Damages Contentions Pursuant to Patent Local Rule 3-8. Exhibit 7  
16 contains financial information concerning and the technical underpinnings and development of  
17 Juniper's highly proprietary software—which includes much information that Juniper maintains as  
18 trade secrets. Juniper expends significant effort in maintaining the secrecy of its software  
19 architecture and development, including, for example, implementing strict screening procedures  
20 for visitors to its engineering campus. Public disclosure of essential nonpublic facts about  
21 Juniper's software development could materially impair Juniper's intellectual property rights and  
22 could cause serious competitive consequences to Juniper's business positioning. Exhibit 7 also  
23 contains sealable confidential information that relate to Juniper's confidential licensing  
24 information that Juniper regularly treats as highly confidential within its business and makes  
25 substantial efforts not to disclose to the public.

26           4.       Exhibit 9 to the Kastens Decl. described above is comprised of excerpts from the  
27 deposition transcript of Finjan's expert Dr. Eric B. Cole; and Exhibit 10 to the Kastens Decl.  
28 described above is comprised of excerpts from the deposition transcript of Juniper's employee

