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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**
14

15 FINJAN, INC., a Delaware Corporation,

16 Plaintiff,

17 v.

18 JUNIPER NETWORKS, INC., a Delaware
19 Corporation,

20 Defendant.
21

Case No.: 3:17-cv-05659-WHA

**DECLARATION OF CRISTINA
MARTINEZ IN SUPPORT OF
DEFENDANT JUNIPER NETWORKS,
INC.'S ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL (DKT.
NO. 246)**

1 I, Cristina Martinez, 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 Juniper’s Administrative Motion to Seal its Reply
 5 in Support of Juniper’s Motion to Exclude Opinions of Damages Expert Mr. Kevin M. Arst and Exhibits
 6 1-3 thereto (Dkt. No. 246).

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 Reply in Support of Juniper’s Motion to Exclude Opinions of Damages Expert Mr. Kevin M. Arst (“Juniper Reply”) at page 5, ll.5-7	Finjan

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

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

22 6. The remaining portions of Juniper’s Reply and Exhibits 1-3 thereto contain Juniper’s
 23 confidential financial, licensing, and/or technical information.

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1 I declare under penalty of perjury under the laws of the United States of America that each of the
2 above statements is true and corrected. Executed on November 27, 2018, in New York, New York.

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4 By: /s/ Cristina Martinez
Cristina Martinez

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6
7 **ATTESTATION**

8 Pursuant to Civil Local Rule 5-1(i), the filer attests that concurrence in the filing of this
9 document has been obtained from the signatories above.

10
11 /s/ Kristopher Kastens
Kristopher Kastens