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

1 I, Austin Manes, 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 Motions in Limine Nos. 1-4 and Oppositions thereto, pursuant to Civil
 6 Local Rules 79-5(d)-(e).

7 3. I have reviewed the following documents and confirmed with counsel for Juniper that
 8 they should be sealed pursuant to the stipulated protective order in this litigation. Finjan relies on
 9 Juniper’s confidentiality designations.

Identification of Documents to be Sealed	Entity that Designated the Information to be Confidential
Finjan’s Motion in Limine (“MIL”) No. 1 in its entirety	Juniper
Exhibits 3, 4, 11, 13-15, 17 to Declaration of Kristopher Kastens in Support of Finjan’s Motions in Limine Nos. 1-4 (“Kastens Declaration”) in their entirety	Juniper
Exhibit 6 to Kastens Declaration at ¶¶ 79-90, 93-168	Juniper
Juniper’s Opposition to Finjan’s MIL No. 1 at page 2, line 3; page 3, lines 8, 9, 13, and 18	Juniper
Juniper’s Opposition to Finjan’s MIL No. 4 at page 2, lines 9-10	Juniper
Exhibit 4 to Declaration of Josh Glucoft in Support of Juniper’s Oppositions to Motions in Limine Nos. 1-4 (“Glucoft Declaration”) at page 1	Juniper
Exhibits 5 and 6 to Glucoft Declaration in their entirety	Juniper
Exhibit 8 to Glucoft Declaration at ¶¶ 100-101, 139-140, 158-59	Juniper
Exhibit 9 to Glucoft Declaration at ¶¶ 80-83, 85, 92-94	Juniper

22 4. Finjan seeks to seal only those documents and portions of documents that Juniper
 23 identified as containing confidential information pursuant to the Protective Order.

24 5. Finjan steeks to seal Finjan’s Motion in Limine No. 1 in its entirety as these portions
 25 contain information that Juniper has designated as “Highly Confidential – Attorneys’ Eyes Only.”
 26 Finjan relies on Juniper’s representations and confidentiality designations.

27 6. Finjan seeks to seal Exhibits 3, 4, 11, 13-15, 17 to the Kastens Declaration because these
 28

1 documents contain information that Juniper has designated as “Highly Confidential – Attorneys’ Eyes
2 Only.” Finjan relies on Juniper’s representations and confidentiality designations.

3 7. Finjan seeks to seal Exhibit 6 to the Kastens Declaration at ¶¶ 79-90, and 93-168 because
4 these portions contain information that Juniper has designated as “Highly Confidential – Attorneys’ Eyes
5 Only.” Finjan relies on Juniper’s representations and confidentiality designations.

6 8. Finjan seeks to seal Juniper’s Opposition to Finjan’s Motion in Limine No. 1 at page 2,
7 line 3; page 3, lines 8, 9, 13, and 18 as these portions contain information that Juniper has designated as
8 “Highly Confidential – Attorneys’ Eyes Only.” Finjan relies on Juniper’s representations and
9 confidentiality designations.

10 9. Finjan seeks to seal Juniper’s Opposition to Finjan’s Motion in Limine No. 4 at page 2,
11 lines 9-10 as these portions contain information that Juniper has designated as “Highly Confidential –
12 Attorneys’ Eyes Only.” Finjan relies on Juniper’s representations and confidentiality designations.

13 10. Finjan seeks to seal Exhibit 4 to the Glucoft Declaration at page 1 as these portions
14 contain information that Juniper has designated as “Highly Confidential – Attorneys’ Eyes Only.”
15 Finjan relies on Juniper’s representations and confidentiality designations.

16 11. Finjan seeks to seal Exhibit 5 and 6 to the Glucoft Declaration because these documents
17 contain information that Juniper has designated as “Highly Confidential – Attorneys’ Eyes Only.”
18 Finjan relies on Juniper’s representations and confidentiality designations.

19 12. Finjan seeks to seal Exhibit 8 to Glucoft Declaration at ¶¶ 100-101, 139-140, 158-59 as
20 these portions contain information that Juniper has designated as “Highly Confidential – Attorneys’ Eyes
21 Only.” Finjan relies on Juniper’s representations and confidentiality designations.

22 13. Finjan seeks to seal Exhibit 9 to Glucoft Declaration at ¶¶ 80-83, 85, 92-94 as these
23 portions contain information that Juniper has designated as “Highly Confidential – Attorneys’ Eyes
24 Only.” Finjan relies on Juniper’s representations and confidentiality designations.

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 Menlo Park, California.

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4 By: /s/ Austin Manes
5 Austin Manes

6 **ATTESTATION**

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

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10 /s/ Kristopher Kastens
11 Kristopher Kastens
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