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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 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 Joint Proposed Jury Instructions, pursuant to Civil Local Rules 79-5(d)-
 6 (e).

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

Identification of Documents to be Sealed	Entity that Designated the Information to be Confidential
Joint Proposed Jury Instructions, page 44, lines 19-20	Finjan

12 4. This Administrative Motion to File Documents Under Seal should be granted because
 13 there are good cause and compelling reasons to seal the identified document. Finjan seeks to seal only
 14 those documents and portions of documents that it identified as containing confidential information
 15 pursuant to the Protective Order.

16 5. Finjan seeks to seal Joint Proposed Jury Instructions, redacted portions on page 44, lines
 17 19-20 because these portions contain information that Finjan has designated as “Highly Confidential –
 18 Attorneys’ Eyes Only.” Specifically, it contains information related to confidential license agreements
 19 with third parties that is subject to third-party confidentiality obligations and Finjan maintains as
 20 confidential within its business. Public disclosure of this information would prejudice Finjan’s ability to
 21 engage in future licensing negotiations and be in violation of its confidentiality obligations to a third
 22 party.

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 27, 2018, in Menlo Park, California.

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 26 By: /s/ Austin Manes
 Austin Manes

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ATTESTATION

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

/s/ Paul Andre
Paul Andre