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12 *Attorneys for Defendant*  
13 JUNIPER NETWORKS, INC.

14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN FRANCISCO DIVISION**

17 FINJAN, INC., ) Case No. 3:17-cv-05659-WHA  
18 )  
19 Plaintiff, ) **DECLARATION OF SHARON SONG ON**  
20 vs. ) **BEHALF OF DEFENDANT JUNIPER**  
21 JUNIPER NETWORKS, INC., ) **NETWORKS, INC. IN SUPPORT OF**  
22 ) **FINJAN, INC.’S ADMINISTRATIVE**  
23 ) **MOTION TO FILE DOCUMENTS**  
24 ) **UNDER SEAL (DKT. NO. 244)**  
25 )  
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. 244), which moves the Court for an order to file under seal the following items related to Juniper:

- Select portions of pages 1-7 of Finjan’s Reply Brief In Support of Its Motion to Exclude Opinions of Damages Expert Dr. Keith R. Ugone (“Finjan’s Reply”); and
- Exhibits 1 and 4 to the Declaration of Kristopher Kastens in Support of Finjan’s Reply (“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 comprised of excerpts from the deposition transcript of Juniper’s damages expert Dr. Keith R. Ugone. These excerpts contain sealable confidential information that relate 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

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1 relate to Juniper's confidential licensing information that Juniper regularly treats as highly  
2 confidential within its business and makes substantial efforts not to disclose to the public.

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

12       3.       The select portions of pages 1-7 of Finjan's Reply described above paraphrase or  
13 refer to the information contained in Exhibits 1 and 4 to the Kastens Decl., which reflect financial  
14 information concerning and the technical underpinnings and development of Juniper's highly  
15 proprietary software—which includes much information that Juniper maintains as trade secrets.  
16 Juniper expends significant effort in maintaining the secrecy of its software architecture and  
17 development, including, for example, implementing strict screening procedures for visitors to its  
18 engineering campus. Public disclosure of essential nonpublic facts about Juniper's software  
19 development could materially impair Juniper's intellectual property rights and could cause serious  
20 competitive consequences to Juniper's business positioning. These select portions of Finjan's  
21 Reply also contain sealable confidential information that relate to Juniper's confidential licensing  
22 information that Juniper regularly treats as highly confidential within its business and makes  
23 substantial efforts not to disclose to the public.

24       4.       In light of the foregoing, there are compelling reasons to seal the documents  
25 described above.

26       Executed on November 28, 2018 in Los Angeles, California.

27       [Signature page to follow]  
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1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct to the best of my knowledge.

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4 /s/ Sharon Song

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