PAUL J. ANDRE (State Bar No. 196585)	
pandre@kramerlevin.com	
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jhannah@kramerlevin.com	
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	IID
990 Marsh Road	LLI
Menlo Park, CA 94025	
Facsimile: (650) 752-1800	
Attorneys for Plaintiff	
FINJAN, INC.	
12 IN THE UNITED STATES DISTRICT COURT	
FOR THE NORTHER	N DISTRICT OF CALIFORNIA
SAN FRA	NCISCO DIVISION
	NOISCO DIVISION
FINIAN INC Delegan Company	C N 2-17 05/50 WILL
FINJAN, INC., a Delaware Corporation,	Case No.: 3:17-cv-05659-WHA
Plaintiff,	PLAINTIFF FINJAN, INC.'S
	ADMINISTRATIVE MOTION TO FILE
v.	DOCUMENTS UNDER SEAL
IIINIPER NETWORKS INC. a Delaware	
Defendant.	
	pandre@kramerlevin.com LISA KOBIALKA (State Bar No. 191404) lkobialka@kramerlevin.com JAMES HANNAH (State Bar No. 237978) jhannah@kramerlevin.com KRISTOPHER KASTENS (State Bar No. 254 kkastens@kramerlevin.com KRAMER LEVIN NAFTALIS & FRANKEL 990 Marsh Road Menlo Park, CA 94025 Telephone: (650) 752-1700 Facsimile: (650) 752-1800 Attorneys for Plaintiff FINJAN, INC. IN THE UNITED S FOR THE NORTHER SAN FRA FINJAN, INC., a Delaware Corporation, Plaintiff,



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I.

INTRODUCTION

Pursuant to Federal Rule of Civil Procedure 26(c), Civil Local Rules 7-11 and 79-5, Plaintiff, Finjan, Inc. ("Finjan"), brings this Administrative Motion to File Under Seal. The document identified below contain confidential information of Juniper. Specifically, there exist good cause and compelling reasons to file the following document under seal:

Identification of Documents to be Sealed	Entity that Designated the
	Information to be
	Confidential
Finjan's Offer of Proof, page 2, lines 3-5, 28; page 5, line 20	Juniper

II. ARGUMENT

This Administrative Motion to File Documents Under Seal should be granted because there are good cause and compelling reasons to seal the identified document. Finjan seeks to seal only those documents and portions of documents that containing Juniper's confidential information pursuant to the Protective Order.

Finjan seeks to seal Finjan's Offer of Proof, redacted portions at page 2, lines 3-5, 28; page 5, line 20, as set forth in the accompanying declaration of Austin Manes in Support of this Administrative Motion ("Manes Sealing Declaration"), because these portions contain information that Juniper has designated as "Highly Confidential – Attorneys' Eyes Only." Finjan seeks to seal material that contains Juniper's confidential information because they relate to confidential Juniper financial information. Finjan relies on Juniper's representations and confidentiality designations.

Pursuant to Civil Local Rule 79-5, Finjan has filed publicly the relevant excerpts of information that are not confidential. Attached hereto are redacted and unredacted versions of the documents set forth above.

III. CONCLUSION

For the foregoing reasons, Finjan respectfully requests that the Court grant its Administrative Motion to File Documents Under Seal.



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Respectfully submitted, 1 Dated: December 7, 2018 By: /s/ Paul Andre 2 Paul J. Andre (State Bar No. 196585) 3 Lisa Kobialka (State Bar No. 191404) James Hannah (State Bar No. 237978) 4 Kristopher Kastens (State Bar No. 254797) KRAMER LEVIN NAFTALIS 5 & FRANKEL LLP 990 Marsh Road 6 Menlo Park, CA 94025 7 Telephone: (650) 752-1700 Facsimile: (650) 752-1800 8 pandre@kramerlevin.com <u>lkobialka@kramerlevin.com</u> 9 jhannah@kramerlevin.com kkastens@kramerlevin.com 10 11 Attorneys for Plaintiff FINJAN, INC. 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27

