	Case 3:17-cv-05659-WHA	Document 364-1	Filed 01/31/19	Page 1 of 4
1 2 3 4 5 6 7 8 9 10	PAUL J. ANDRE (State Bar No. 19658 <u>pandre@kramerlevin.com</u> LISA KOBIALKA (State Bar No. 1914 <u>lkobialka@kramerlevin.com</u> JAMES HANNAH (State Bar No. 2379 <u>jhannah@kramerlevin.com</u> KRISTOPHER KASTENS (State Bar N <u>kkastens@kramerlevin.com</u> KRAMER LEVIN NAFTALIS & FRA 990 Marsh Road Menlo Park, CA 94025 Telephone: (650) 752-1700 Facsimile: (650) 752-1800 <i>Attorneys for Plaintiff</i> FINJAN, INC.	404) 978) No. 254797)		
11	IN THE UN	ITED STATES D	ISTRICT COUR	? Т
12		RTHERN DISTRI		
13		N FRANCISCO I		
14	J. JA			
15	FINJAN, INC., a Delaware Corporation	on, Case	No.: 3:17-cv-0565	9-WHA
16	Plaintiff,			AUSTIN MANES IN
17	V.			TIFF FINJAN, INC.'S MOTION TO FILE
18	UNIDED NETWODKS INC. a Dala		UMENTS UNDE	R SEAL
19	JUNIPER NETWORKS, INC., a Dela Corporation,	iwait		
20	Defendant.			
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1 I, Austin Manes, declare:

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I have personal knowledge of the facts stated herein.

I am an attorney at Kramer Levin Naftalis & Frankel LLP, counsel of record for Finjan,
 Inc. ("Finjan"). I make this declaration in support of Plaintiff Finjan, Inc.'s Reply in Support of its
 Renewed Motion for Judgment as a Matter of Law Pursuant to Fed. R. Civ. P. 50(b); Motion for New
 Trial under Fed. R. Civ. P. 59; and Motion for Certification for Immediate Appeal in the Alternative,
 pursuant to Civil Local Rules 79-5(d)-(e).

8 3. I have reviewed the following documents and confirmed that they contain information
9 designated as "Highly Confidential – Attorneys' Eyes Only" or "Highly Confidential – Attorneys' Eyes
10 Only – Source Code" by Juniper pursuant to the stipulated protective order in this litigation.

11					
12	Identification of Documents to be Sealed	Entity that Designated the Information to be			
13		Confidential			
14	Plaintiff Finjan, Inc.'s Reply in Support of its Renewed Motion for Judgment as a Matter of Law Pursuant to Fed. R.	Juniper			
15	Civ. P. 50(b); Motion for New Trial under Fed. R. Civ. P. 59; and Motion for Certification for Immediate Appeal in the				
16	Alternative, at the following page:line numbers: 4:22-24; 5:3-4; and 6:17-18.				
17					
18	Exhibits 2 and 5-7 to the Kastens Declaration filed in support	Juniper			
19	of Plaintiff Finjan, Inc.'s Reply in Support of its Renewed Motion for Judgment as a Matter of Law Pursuant to Fed. R.				
20	Civ. P. 50(b); Motion for New Trial under Fed. R. Civ. P. 59; and Motion for Certification for Immediate Appeal in the				
21	Alternative				
22	4. This Administrative Motion to File Documents Unde	er Seal should be granted because			
23	good cause and compelling reasons exist to seal the documents identified above. Finjan seeks to seal				
24	a only those documents and portions of documents that Juniper identified as containing confidential				
25	information pursuant to the Protective Order.				
26	5. Finjan seeks to seal Plaintiff Finjan, Inc.'s Reply in S	upport of its Renewed Motion for			
27	Judgement as a Matter of Law Pursuant to Fed. R. Civ. P. 50(b); Mc	tion for New Trial under Fed. R.			
20					

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1	Civ. P. 59; and Motion for Certification for Immediate Appeal in the Alternative at the following
2	page:line numbers: 4:22-24; 5:3-4; and 6:17-18, and Exhibits 2 and 5-7 to the Kastens Declaration filed
3	in support of the same, because these portions contain descriptions or quotes from Juniper's technical
4	documents or source code, or Juniper's financial and sales information, the public disclosure of which
5	Juniper claims could harm its business.
6	6. I declare under penalty of perjury under the laws of the United States of America that
7	each of the above statements is true and corrected. Executed on January 31, 2019, in Menlo Park,
8	California.
9	By: /s/ Austin Manes
10	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.

Α

RM

<u>/s/</u>	Lisa	Kolbialka	
Lis	a Kol	bialka	

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