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 13 JUNIPER NETWORKS, INC.

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

18 FINJAN, INC.,)	Case No. 3:17-cv-05659-WHA
)	
19 Plaintiff,)	DEFENDANT JUNIPER NETWORKS,
)	INC.'S MOTION FOR
20 vs.)	ADMINISTRATIVE RELIEF TO FILE
)	DOCUMENTS UNDER SEAL
21 JUNIPER NETWORKS, INC.,)	
)	
22 Defendant.)	Judge: Hon. William Alsup
)	

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NOTICE OF MOTION AND MOTION

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT pursuant to Federal Rule of Civil Procedure 5.2(d) and Civil Local Rules 7-11 and 79-5, Defendant Juniper Networks, Inc. (“Juniper”) respectfully moves the Court for an Order instructing the Clerk of the Court to file under seal the following documents:

- Juniper’s unredacted Motion for Summary Judgment for Claim 9 of U.S. Patent No. 6,804,780 (the “Brief”);
- Exhibit 6 to the Brief (excerpts from the deposition transcript of Finjan employee John Garland);
- Unredacted Exhibit 8 to the Brief (excerpts from Finjan’s Objections and Responses to Juniper’s First Set of Interrogatories);
- Exhibit 9 to the Brief (excerpts from the deposition transcript of Finjan employee Julie Mar-Spinola);
- Unredacted Declaration of Aviel D. Rubin in support of the Brief.

This motion is based upon this Notice of Motion; the accompanying Memorandum of Points and Authorities; the Declaration of Sharon Song (the “Sealing Declaration”); such other evidence and arguments as the Court may consider; and all other matters of which the Court may take judicial notice.

MEMORANDUM OF POINTS AND AUTHORITIES

Pursuant to Federal Rule of Civil Procedure 5.2(d) and Civil Local Rules 7-11 and 79-5, Juniper hereby submits a request for an Order instructing the Clerk of the Court to file under seal the unredacted documents described above.

Exhibit 6 to the Brief is excerpts of the deposition transcript of Finjan employee John Garland that have been designated confidential by Finjan.

The redacted portions of Exhibit 8 to the Brief are excerpts from Finjan’s Objections and Responses to Juniper’s First Set of Interrogatories that have been designated confidential by Finjan.

1 Exhibit 9 to the Brief is excerpts from the deposition transcript of Finjan employee Julie
2 Mar-Spinola that have been designated confidential by Finjan.

3 The redacted portions of the Declaration of Aviel D. Rubin in support of the Brief include
4 discussion of Juniper's confidential technical information related to Juniper's highly proprietary
5 software.

6 The redacted portions of the Brief directly reference the confidential materials discussed
7 above. The redacted portions of the Brief have been designated confidential by Finjan.

8 As discussed in the Sealing Declaration, the redacted portions of the Declaration of Aviel
9 D. Rubin contain sealable confidential information that relate to the technical underpinnings and
10 development of Juniper's highly proprietary software—which includes much information that
11 Juniper maintains as trade secrets. Juniper expends significant effort in maintaining the secrecy of
12 its software architecture and development, including, for example, implementing strict screening
13 procedures for visitors to its engineering campus. Public disclosure of essential nonpublic facts
14 about Juniper's software development could materially impair Juniper's intellectual property
15 rights and could cause serious competitive consequences to Juniper's business positioning.

16 Also as discussed in the Sealing Declaration, Exhibits 6 and 9, and the redacted portions of
17 Exhibit 8 and the Brief were designated confidential by Finjan.

18 This request is narrowly tailored to seal only that material for which compelling reasons to
19 seal have been established. The bases for this request are set forth in further detail in the
20 accompanying Sealing Declaration. On these grounds, Juniper respectfully requests that the Court
21 order sealed the redacted portions of the documents described above.

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23 Dated: February 14, 2019

Respectfully submitted,

24 IRELL & MANELLA LLP

25
26 By: /s/ Kevin Wang
27 Kevin Wang
28 Attorneys for Defendant
Juniper Networks, Inc.