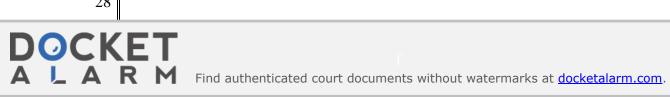
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15	UNITED STATES DISTRICT COURT	
16	NORTHERN DISTRICT OF CALIFORNIA	
17	SAN FRANCI	SCO DIVISION
17 18	FINJAN, INC.,	SCO DIVISION Case No. 3:17-cv-05659-WHA
171819		Case No. 3:17-cv-05659-WHA DEFENDANT JUNIPER NETWORKS, INC.'S MOTION FOR
18	FINJAN, INC., Plaintiff, vs.	Case No. 3:17-cv-05659-WHA DEFENDANT JUNIPER NETWORKS,
18 19	FINJAN, INC., Plaintiff, vs. JUNIPER NETWORKS, INC.,	Case No. 3:17-cv-05659-WHA DEFENDANT JUNIPER NETWORKS, INC.'S MOTION FOR ADMINISTRATIVE RELIEF TO FILE
18 19 20	FINJAN, INC., Plaintiff, vs.	Case No. 3:17-cv-05659-WHA DEFENDANT JUNIPER NETWORKS, INC.'S MOTION FOR ADMINISTRATIVE RELIEF TO FILE DOCUMENTS UNDER SEAL
18 19 20 21	FINJAN, INC., Plaintiff, vs. JUNIPER NETWORKS, INC.,	Case No. 3:17-cv-05659-WHA DEFENDANT JUNIPER NETWORKS, INC.'S MOTION FOR ADMINISTRATIVE RELIEF TO FILE DOCUMENTS UNDER SEAL
18 19 20 21 22	FINJAN, INC., Plaintiff, vs. JUNIPER NETWORKS, INC.,	Case No. 3:17-cv-05659-WHA DEFENDANT JUNIPER NETWORKS, INC.'S MOTION FOR ADMINISTRATIVE RELIEF TO FILE DOCUMENTS UNDER SEAL
18 19 20 21 22 23	FINJAN, INC., Plaintiff, vs. JUNIPER NETWORKS, INC.,	Case No. 3:17-cv-05659-WHA DEFENDANT JUNIPER NETWORKS, INC.'S MOTION FOR ADMINISTRATIVE RELIEF TO FILE DOCUMENTS UNDER SEAL
18 19 20 21 22 23 24	FINJAN, INC., Plaintiff, vs. JUNIPER NETWORKS, INC.,	Case No. 3:17-cv-05659-WHA DEFENDANT JUNIPER NETWORKS, INC.'S MOTION FOR ADMINISTRATIVE RELIEF TO FILE DOCUMENTS UNDER SEAL
18 19 20 21 22 23 24 25	FINJAN, INC., Plaintiff, vs. JUNIPER NETWORKS, INC.,	Case No. 3:17-cv-05659-WHA DEFENDANT JUNIPER NETWORKS, INC.'S MOTION FOR ADMINISTRATIVE RELIEF TO FILE DOCUMENTS UNDER SEAL



1 NOTICE OF MOTION AND MOTION TO ALL PARTIES AND THEIR COUNSEL OF RECORD: 2 3 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 4 5 the Court for an Order instructing the Clerk of the Court to file under seal the following documents: 6 7 Juniper's unredacted Motion for Summary Judgment for Claim 9 of U.S. Patent No. 6,804,780 (the "Brief"); 8 9 Exhibit 6 to the Brief (excerpts from the deposition transcript of Finjan employee John 10 Garland); 11 Unredacted Exhibit 8 to the Brief (excerpts from Finjan's Objections and Responses to Juniper's First Set of Interrogatories); 12 13 Exhibit 9 to the Brief (excerpts from the deposition transcript of Finjan employee Julie 14 Mar-Spinola); 15 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 16 17 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 18 notice. 19 MEMORANDUM OF POINTS AND AUTHORITIES 20 21 Pursuant to Federal Rule of Civil Procedure 5.2(d) and Civil Local Rules 7-11 and 79-5, 22 Juniper hereby submits a request for an Order instructing the Clerk of the Court to file under seal 23 the unredacted documents described above. Exhibit 6 to the Brief is excerpts of the deposition transcript of Finjan employee John 24 25 Garland that have been designated confidential by Finjan. 26 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 27 Finjan. 28



1 Exhibit 9 to the Brief is excerpts from the deposition transcript of Finjan employee Julie Mar-Spinola that have been designated confidential by Finjan. 2 3 The redacted portions of the Declaration of Aviel D. Rubin in support of the Brief include discussion of Juniper's confidential technical information related to Juniper's highly proprietary 4 5 software. The redacted portions of the Brief directly reference the confidential materials discussed 6 7 above. The redacted portions of the Brief have been designated confidential by Finjan. As discussed in the Sealing Declaration, the redacted portions of the Declaration of Aviel 8 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 its software architecture and development, including, for example, implementing strict screening 12 procedures for visitors to its engineering campus. Public disclosure of essential nonpublic facts 13 about Juniper's software development could materially impair Juniper's intellectual property 14 15 rights and could cause serious competitive consequences to Juniper's business positioning. Also as discussed in the Sealing Declaration, Exhibits 6 and 9, and the redacted portions of 16 Exhibit 8 and the Brief were designated confidential by Finjan. 17 This request is narrowly tailored to seal only that material for which compelling reasons to 18 seal have been established. The bases for this request are set forth in further detail in the 19 20 accompanying Sealing Declaration. On these grounds, Juniper respectfully requests that the Court order sealed the redacted portions of the documents described above. 21 22 23 Dated: February 14, 2019 Respectfully submitted, **IRELL & MANELLA LLP** 24 25 By: /s/ Kevin Wang 26 Kevin Wang 27 Attorneys for Defendant Juniper Networks, Inc. 28

