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12 JUNIPER NETWORKS, INC.

13
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)
Plaintiff,) **DECLARATION OF KEVIN WANG ON**
19) **BEHALF OF DEFENDANT JUNIPER**
vs.) **NETWORKS, INC. IN SUPPORT OF**
20) **FINJAN, INC.’S ADMINISTRATIVE**
JUNIPER NETWORKS, INC.,) **MOTION TO FILE DOCUMENTS**
21) **UNDER SEAL (DKT. NO. 368)**
Defendant.)
22) Judge: Hon. William Alsup
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DECLARATION OF KEVIN WANG

I, Kevin Wang, 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 action. 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. 368), which moves the Court for an order to file under seal the following items related to Juniper:

- Select portions of pages 4-6, and 9-25 of Finjan’s Motion for Summary Judgment (“Finjan’s Motion”) that contain information designated as confidential by Juniper;
- Select portions of pages 4-33 of the Declaration of Dr. Michael Mitzenmacher in Support of Finjan’s Motion (“Mitzenmacher Decl.”);
- Exhibits 2-6, 9-12, 14, 16, and 18-20 to the 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.

3. Exhibits 2-6, 9-12, 14, 16, and 18-20 to the Kastens Decl. described above are highly confidential documents or source code produced by Juniper to Finjan. These documents have never been made public and contain information related to 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.

1 4. Select portions of pages 4-6 and 9-25 of Finjan’s Motion that contain information
 2 designated as confidential by Juniper and select portions of pages 4-33 of the Mitzenmacher Decl.
 3 reflect the technical underpinnings and development of Juniper’s highly proprietary software and
 4 contain much information that Juniper maintains as trade secrets. Juniper expends significant
 5 effort in maintaining the secrecy of its software architecture and development, including, for
 6 example, implementing strict screening procedures for visitors to its engineering campus. Public
 7 disclosure of essential nonpublic facts about Juniper’s software development could materially
 8 impair Juniper’s intellectual property rights and could cause serious competitive consequences to
 9 Juniper’s business positioning.

10 5. In light of the foregoing, there are compelling reasons to seal the documents
 11 described above.

12 Executed on February 18, 2019 in Newport Beach, California.

13 I declare under penalty of perjury under the laws of the United States of America that the
 14 foregoing is true and correct to the best of my knowledge.

15
 16 /s/ Kevin Wang
 17 Kevin Wang

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