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11 FINJAN, INC.

11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

15 FINJAN, INC., a Delaware Corporation,

16 Plaintiff,

17 v.

18 JUNIPER NETWORKS, INC., a Delaware
19 Corporation,

20 Defendant.

Case No.: 3:17-cv-05659-WHA

**PLAINTIFF FINJAN, INC.'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

1 **I. INTRODUCTION**

2 Pursuant to Federal Rule of Civil Procedure 26(c), Civil Local Rules 7-11 and 79-5, Plaintiff,
3 Finjan, Inc. (“Finjan”), brings this Administrative Motion to File Documents Under Seal for the
4 documents identified below, which contain confidential information of Juniper. Specifically, there exist
5 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
Plaintiff Finjan, Inc.’s Opposition to Defendant Juniper Networks, Inc.’s Motion to Strike Theories From Juniper Networks, Inc.’s Motion for Summary Judgment, and Motion to Amend, at the following page:line numbers: 2:18-19; 3:4-8; 3:10-24; 3:26-27; 4:1-20; 5:11-12; 6:19-24; 7:10-16; 7:19-28; 8:1-26; 9:1-12; 9:19-27; 10:1-9; 10:17-26; 11:8-23; 11:25-27; 12:1; 12:3-10; 12:17-26; 13:1-2; 13:17-21.	Juniper
Declaration of Kristopher Kastens filed in Support of Plaintiff Finjan, Inc.’s Opposition to Defendant Juniper Networks, Inc.’s Motion to Strike Theories From Finjan’s Motion for Summary Judgment, and Motion to Amend (“Kastens Declaration”), at the following page and line number: page 1, line 13.	Juniper
Exhibit B to the Kastens Declaration, at the following page: line numbers: page 1 and page 2.	Juniper
Exhibit D to the Kastens Declaration at page 1:22-26, 2:1-5, 6:2-25 and 7:1-11.	Juniper

18 **II. ARGUMENT**

19 This Administrative Motion to File Documents Under Seal should be granted because good
20 cause and compelling reasons exist to seal the documents identified above. Finjan seeks to seal only
21 those documents and portions of documents that Juniper identified as containing confidential
22 information pursuant to the Protective Order.

23 Finjan seeks to seal Plaintiff Finjan, Inc.’s Opposition to Defendant Juniper Networks, Inc.’s
24 Motion to Strike Theories From Juniper Networks, Inc.’s Motion for Summary Judgment, and Motion
25 to Amend at the following page:line numbers: 2:18-19; 3:4-8; 3:10-24; 3:26-27; 4:1-20; 5:11-12; 6:19-
26 24; 7:10-16; 7:19-28; 8:1-26; 9:1-12; 9:19-27; 10:1-9; 10:17-26; 11:8-23; 11:25-27; 12:1; 12:3-10;
27 12:17-26; 13:1-2; 13:17-21, and Exhibits B and D to the Kastens Declaration, filed in support of the

1 same, including page 1, line 13 of the Kastens Declaration, as set forth in the accompanying declaration
2 of Marcus Colucci in Support of this Administrative Motion (“Colucci Sealing Declaration”), because
3 these portions contain information that Juniper has designated as “Highly Confidential – Attorneys’
4 Eyes Only” or “Highly Confidential – Attorneys’ Eyes Only – Source Code.” Specifically, this
5 information contains descriptions or quotes from Juniper’s technical documents or source code, the
6 public disclosure of which Juniper claims could harm its business.

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

10 **III. CONCLUSION**

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

13 Respectfully submitted,

14 Dated: March 28, 2019

15 By: /s/ Kristopher Kastens
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