

1 IRELL & MANELLA LLP
 Jonathan S. Kagan (SBN 166039)
 2 jkagan@irell.com
 Joshua P. Glucoft (SBN 301249)
 3 jglucoft@irell.com
 1800 Avenue of the Stars, Suite 900
 4 Los Angeles, California 90067-4276
 Telephone: (310) 277-1010
 5 Facsimile: (310) 203-7199

6 Rebecca L. Carson (SBN 254105)
 rcarson@irell.com
 7 Ingrid M. H. Petersen (SBN 313927)
 ipetersen@irell.com
 8 Kevin Wang (SBN 318024)
 kwang@irell.com
 9 840 Newport Center Drive, Suite 400
 Newport Beach, California 92660-6324
 10 Telephone: (949) 760-0991
 Facsimile: (949) 760-5200

11 *Attorneys for Defendant*
 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 INGRID PETERSEN
)	ON BEHALF OF DEFENDANT JUNIPER
19 vs.)	NETWORKS, INC. IN SUPPORT OF
)	FINJAN, INC.'S ADMINISTRATIVE
20 JUNIPER NETWORKS, INC.,)	MOTION TO FILE DOCUMENTS
)	UNDER SEAL (DKT. NO. 414)
21 Defendant.)	
		Judge: Hon. William Alsup

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DECLARATION OF INGRID PETERSEN

I, Ingrid Petersen, 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 matter. 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. 414).

3. I have reviewed the portions of the documents that Finjan has sought to seal, and I believe that, regarding Juniper’s confidential information, the following should be sealed:

Document	Juniper’s Designations of Portions to Be Sealed	Juniper’s Basis for Sealing
Plaintiff Finjan, Inc.’s Reply in Support of Its Second Motion for Early Summary Judgment, Regarding Infringement of Claim 1 of U.S. Patent No. 8,141,154	Source code quotes on 7:8, 7:9, 7:15, 8:9, 8:10, 8:11, 10:14, 10:16	Confidential Source Code
Exhibit 1 to Finjan’s Reply	Juniper does not designate any portion of this exhibit to be under seal	N/A

4. I am informed and believe that the right of the public to inspect and copy public records “is not absolute” and that a court may seal confidential information disclosed during the course of a legal proceeding. *Nixon v. Warner Commc’ns, Inc.*, 435 U.S. 589, 598 (1978).

5. “Compelling reasons” exist to seal a record when it might “become a vehicle for improper purposes,” such as the “release of trade secrets.” *Kamakana v. City & Cty. of Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006) (quoting *Nixon*, 435 U.S. at 1179).

6. It is my understanding that portions of the reply disclose Juniper’s confidential source code—the computerized instructions describing exactly how Juniper’s products work.

