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12 JUNIPER NETWORKS, INC.

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

16 FINJAN, INC.,) Case No. 3:17-cv-05659-WHA
17)
18 Plaintiff,) **DECLARATION OF INGRID PETERSEN**
19 vs.) **IN SUPPORT OF JUNIPER NETWORKS,**
20 JUNIPER NETWORKS, INC.,) **INC.'S ADMINISTRATIVE MOTION TO**
21 Defendant.) **FILE UNDER SEAL**
_____)

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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 Juniper’s April 9, 2019, Administrative Motion to File Under Seal.

3. I am informed and believe that good cause and compelling reasons exist for sealing the following:

Docket No.	Filing Date	Portion to Be Sealed	Designating Party
412-3	3/29/2019	Entire Exhibit	Joe Security
412-4	3/29/2019	Entire Exhibit	Joe Security
411-16	3/29/2019	Entire Exhibit	Joe Security

4. It is my understanding that Finjan, Inc., filed these documents in support of its Motion to Set Aside Verdict (Dkt. 412).

5. Additionally, it is my understanding that these filings contains documents from Joe Security LLC (“Joe Security”).

6. Attached as Exhibit A is a true and correct copy of communications between Joe Security’s counsel and I.

7. As Exhibit A shows, Joe Security believes that these documents contain proprietary and confidential information.

8. I, therefore, believe that good cause and compelling reasons exist.

1 Executed on April 9, 2019, at Newport Beach, California.

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

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/s/ Ingrid Petersen

Ingrid Petersen
Attorney for Defendant
Juniper Networks, Inc.