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11 *Attorneys for Plaintiff*
12 FINJAN, INC.

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

16 FINJAN, INC., a Delaware Corporation,

17 Plaintiff,

18 v.

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

21 Defendant.

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

**DECLARATION OF KRISTOPHER
KASTENS IN SUPPORT OF DEFENDANT
JUNIPER NETWORKS INC.'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

1 I, Kristopher Kastens, declare:

2 1. I have personal knowledge of the facts stated herein.

3 2. I am an attorney at Kramer Levin Naftalis & Frankel LLP, counsel of record for Finjan,
4 Inc. (“Finjan”). I make this declaration in support of Defendant Juniper Network Inc.’s Motion to Seal
5 its Reply in the Second Motion for Early Summary Judgment Regarding Infringement of Claim 9 of
6 U.S. Patent No. 6,804,780, pursuant to Civil Local Rules 79-5(d)-(e).

7 3. I have reviewed the following documents and confirmed that they contain information
8 designated as “Highly Confidential – Attorneys’ Eyes Only” by Finjan and Juniper pursuant to the
9 stipulated protective order in this litigation.

Identification of Documents to be Sealed	Entity that Designated the Information to be Confidential
Highlighted Text in Pages 13:28; 14:2-4 of Juniper’s Reply Brief ISO Juniper’s MSJ regarding Claim 9 of the ’780 Patent.	Finjan and Juniper

14 4. Juniper’s Motion to seal the portion identified above should be granted because good
15 cause and compelling reasons exist to seal such identified portion, and such request is narrowly tailored.
16 Specifically, the portion that sought to sealed contains references to confidential email communications
17 between Finjan and Juniper (which acquired Cyphort) regarding licensing and negotiation information,
18 the public disclosure of which could harm Finjan’s business. Further, it is my understanding that these
19 communications fall under the protection of the Nondisclosure Agreement between Finjan and
20 Juniper/Cyphort.

21 5. I declare under penalty of perjury under the laws of the United States of America that
22 each of the above statements is true and corrected. Executed on April 9, 2019, in Menlo Park,
23 California.

24 By: /s/ Kristopher Kastens
25 Kristopher Kastens