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9 *Attorneys for Plaintiff*
10 FINJAN, INC.

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

15 FINJAN, INC., a Delaware Corporation,

16 Plaintiff,

17 v.

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

20 Defendant.
21

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 Letter to the Court re Juniper’s Assertion of Joint Defense Group Privilege, at page 2, ¶ 1, ll. 6-7, 10-11; page 2, ¶ 2, ll. 2-6, 9-13; and page 3, ¶ 1, ll. 16-20.	Juniper
Exhibits 2-3 to Plaintiff Finjan, Inc.’s Letter to the Court re Juniper’s Assertion of Joint Defense Group Privilege in their entirety.	Juniper
Exhibits 4 at page 2, ¶ 2, ll. 5-6, 9-13 to Plaintiff Finjan, Inc.’s Letter to the Court re Juniper’s Assertion of Joint Defense Group Privilege.	Juniper

16 **II. ARGUMENT**

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

21 Finjan seeks to seal portions of Plaintiff Finjan, Inc.’s Letter to the Court re Juniper’s Assertion
22 of Joint Defense Group Privilege at page 2, paragraph 1, ll. 6-7, 10-11; page 2, paragraph 2, lines 2-6,
23 9-13; page 3, paragraph 1, lines 16-20; Exhibits 2-3 in their entirety; and Exhibit 4 at page 2, paragraph
24 2, lines 5-6 and 9-13, filed in support of the same, as set forth in the accompanying declaration of
25 Kristopher Kastens in Support of this Administrative Motion, because these portions contain
26 information that Juniper has designated as “Highly Confidential – Attorneys’ Eyes Only.” Specifically,
27 this information contains confidential deposition testimony of Juniper witnesses, the public disclosure
28 of which Juniper claims could harm its business.

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

4 **III. CONCLUSION**

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

7 Respectfully submitted,

8 Dated: April 11, 2019

9 By: /s/ Kristopher Kastens
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