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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

**DECLARATION OF KRISTOPHER
KASTENS IN SUPPORT OF PLAINTIFF
FINJAN, 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 Plaintiff Finjan, Inc.’s Motion to Seal its Letter to
5 the Court re Juniper’s Assertion of Joint Defense Group Privilege, pursuant to Civil Local Rules 79-5(d)-
6 (e).

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

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

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

24 5. Finjan seeks to seal portions of Plaintiff Finjan, Inc.’s Letter to the Court re Juniper’s
25 Assertion of Joint Defense Group Privilege at page 2, paragraph 1, ll. 6-7, 10-11; page 2, paragraph 2,
26 lines 2-6, 9-13; page 3, paragraph 1, lines 16-20; Exhibits 2-3 in their entirety; and Exhibit 4 at page 2,
27 paragraph 2, lines 5-6 and 9-13, filed in support of the same, because these portions contain descriptions
28 or quotes from Juniper’s technical documents or source code, the public disclosure of which Juniper

1 claims could harm its business.

2 6. I declare under penalty of perjury under the laws of the United States of America that
3 each of the above statements is true and correct. Executed on April 11, 2019, in Menlo Park, California.

4 By: /s/ Kristopher Kastens
5 Kristopher Kastens
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