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11 FINJAN, INC.

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

17 FINJAN, INC., a Delaware Corporation,

18 Plaintiff,

19 v.

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

22 Defendant.
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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 information identified by Defendant Juniper Networks, Inc.
 5 (“Juniper”) as “Confidential,” “Highly Confidential – Attorneys’ Eyes Only,” or “Highly Confidential –
 6 Source Code” under the protective order in this action (Dkt. No. 149). Based on Juniper’s designation,
 7 there exist good cause and compelling reasons to file the following document under seal:

Identification of Documents	Specific Page and Line Numbers to Seal	Entity that Designated the Information to be Confidential	Reason to Keep Sealed
Plaintiff Finjan, Inc.’s Opposition to Defendant Juniper Networks, Inc.’s Motion for Sanctions	Page 1, lines 14-16; Page 6, lines 7-9; Page 13, lines 6-9	Juniper	Designated by Juniper.
Exhibit 4 to the Declaration of Kristopher Kastens filed in support of Plaintiff Finjan, Inc.’s Opposition to Defendant Juniper Networks, Inc.’s Motion for Sanctions (“Kastens Declaration”)	The Entire Exhibit 4	Juniper	Produced by Juniper with a confidentiality designation.
Exhibit 6 to the Kastens Declaration	The Entire Exhibit 6	Juniper	Designated by Juniper.
Exhibit 12 to the Kastens Declaration	The Entire Exhibit 12	Juniper	Produced by Juniper with a confidentiality designation.
Exhibit 14 to the Kastens Declaration	The Entire Exhibit 14	Juniper	Produced by Juniper with a confidentiality designation.
Exhibit 15 to the Kastens Declaration	The Entire Exhibit 15	Juniper	Excerpt of a document produced by Juniper with a confidentiality designation.
Exhibit 16 to the Kastens Declaration	The Entire Exhibit 16	Juniper	Excerpt of a document produced by Juniper with a confidentiality designation.
Exhibit 19 to the Kastens Declaration	The Entire Exhibit 19	Juniper	Designated by Juniper.

Exhibit 21 to the Kastens Declaration	The Entire Exhibit 21	Designated by agreement between Finjan and Juniper	Finjan does not assert that the excerpt reflected in Exhibit 21 needs to be sealed. Finjan moves to seal pursuant to its agreement to give this transcript a confidentiality designation.
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II. ARGUMENT

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

Finjan seeks to seal Plaintiff Finjan, Inc.’s Motion for Relief from Judgment Pursuant to Fed. R. Civ. P. 60(b) at the following page:line numbers: page 1, lines 14-16; page 6, lines 7-9; page 13, lines 6-9 and Exhibits 4, 6, 12, 14, 15, 16, 19, 21 to the Kastens Declaration filed in support of the same, as set forth in the accompanying declaration of Kristopher Kastens in Support of this Administrative Motion (“Kastens Sealing Declaration”), because these portions contain information that Juniper has designated as “Confidential,” “Highly Confidential – Attorneys’ Eyes Only,” or “Highly Confidential – Source Code.” Specifically, these designated documents contain testimony from Juniper’s engineers, information regarding licensing communications with Juniper’s Senior Director of IP Litigation and Strategy, and information relating to Juniper’s revenues and technology, the public disclosure of which Juniper claims could harm its business.

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

III. CONCLUSION

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

Respectfully submitted,

Dated: April 11, 2019

By: /s/ Kristopher Kastens

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