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12 FINJAN, INC.

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

15 FINJAN, INC., a Delaware Corporation,
16 Plaintiff,
17 v.
18 JUNIPER NETWORKS, INC., a Delaware
19 Corporation,
20 Defendant.

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 Administrative Motion to
5 Seal its Reply in Support of its Motion for Relief from Judgment Pursuant to Fed. R. Civ. P. 60(b),
6 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 “Confidential” by third party Joe Security, LLC (“Joe Security”) through Defendant
9 Juniper Networks (“Juniper”), pursuant to the stipulated protective order in this litigation.

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 Reply in Support of its Motion for Relief from Judgment Pursuant to Fed. R. Civ. P. 60(b)	Page 3, line 1; Page 6, lines 10-14; Page 6, line 16; Page 7, line 7; Page 7, line 9; Page 7, lines 12-15; Page 7, lines 23-27; Page 9, lines 9-10; Page 10, lines 17-18; Page 10, lines 20-27; Page 11, line 1; Page 12, lines 9-12	Joe Security, Juniper	Designated by Joe Security as containing confidential and proprietary information. <i>See</i> Dkt. No. 420-3 (correspondence between Juniper and Joe Security).

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

26 5. Finjan seeks to seal Plaintiff Finjan, Inc.’s Reply in Support of its Motion for Relief from
27 Judgment Pursuant to Fed. R. Civ. P. 60(b) at the following page:line numbers: page 3, line 1; page 6,
28

1 lines 10-14; page 6, line 16; page 7, line 7; page 7, line 9; page 7, lines 12-15; page 7, lines 23-27; page
2 9, lines 9-10; page 10, lines 17-18; page 10, lines 20-27; page 11, line 1; page 12, lines 9-12, because
3 these portions contain information from documents that third party Joe Security has designated as
4 “Confidential,” through Juniper’s submission to this Court (Dkt. Nos. 420, 420-3).

5
6 I declare under penalty of perjury under the laws of the United States of America that each of the
7 above statements is true and corrected. Executed on April 19, 2019, in Menlo Park, California.

8 /s/ Kristopher Kastens
9 Kristopher Kastens

10 **ATTESTATION PURSUANT TO L.R. 5-1(I)**

11 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
12 document has been obtained from any other signatory to this document.

13
14 /s/ Lisa Kobialka
15 Lisa Kobialka