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9	Thorny, nec.	Attorneys for Defendant
10		JUNIPER NETWORKS, INC.
11	IN THE UNITED STATES DISTRICT COURT	
12		
13	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
14	SAN FRANCISCO DIVISION	
15	FINJAN, INC., a Delaware Corporation,	Case No.: 3:17-ev-05659-WHA
16	Plaintiff,	STIPULATION AND [PROPOSED] ADDENDUM TO PROTECTIVE ORDER
17	V.	THE DETAIL OF THE THE ORDER
18	JUNIPER NETWORKS, INC., a Delaware	Judge: Honorable William Alsup
19	Corporation,	
20	Defendants.	
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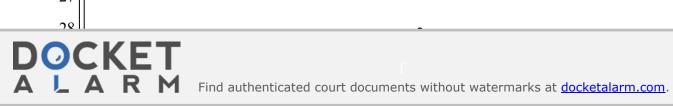
1.

of documents in this case from Defendant Juniper Networks, Inc. ("Defendant") (together with Plaintiff, the "Parties") that relate to materials generated and produced in the course of Finjan's prior litigation with non-party Proofpoint, Inc. ("Proofpoint") (Case No. 4:13-cv-05808-HSG (N.D. Cal.)) and that contain Proofpoint's highly sensitive and confidential business information;

WHEREAS, Plaintiff Finjan, Inc. ("Plaintiff") has received requests for the production

- 2. WHEREAS, Proofpoint seeks protection from disclosure of its highly confidential business information to Defendant's in-house counsel under the terms of the Protective Order in effect in the present litigation, which at the time of this filing is the Patent Local Rule 2-2 Interim Model Protective Order, which allows designated in-house counsel of the parties to access Highly Confidential Attorneys' Eyes Only materials;
- WHEREAS, Plaintiff, Defendant, and Proofpoint have met and conferred and agreed to the following Addendum to the Protective Order governing discovery in the above-captioned litigation to address Proofpoint's concerns;
- 4. THEREFORE, it is hereby agreed by Defendant and ORDERED that dissemination of any of the following materials, including: information or item designated "CONFIDENTIAL," "HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY," or "HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY SOURCE CODE" by Proofpoint in the prior litigation captioned *Finjan, Inc. v. Proofpoint, Inc., et al.*, Case No. 4:13-cv-05808-HSG (N.D. Cal.); the settlement agreement and related drafts and correspondence between Plaintiff, Proofpoint, and/or their respective counsel; or any other materials produced by Finjan in this matter that otherwise contain or refer to the confidential business information of Proofpoint (collectively, "Proofpoint Protected Material") shall be limited to the qualified recipients enumerated in Paragraphs 7.3(a), (c), (d), (e), and (f) set forth in the Patent Local Rule 2-2 Interim Model Protective Order. For the avoidance of doubt, Proofpoint Protected Material may not be disclosed to or accessible by any in-house counsel or employee of Defendant. Additionally, Plaintiff's access to Proofpoint Protected Material produced by Proofpoint shall continue to be governed under the terms of the Protective Order issued at Dkt. No. 96 in *Finjan, Inc. v. Proofpoint, Inc., et al.*, Case No. 4:13-cv-05808-HSG (N.D. Cal.).

1	IT IS SO STIPULATED.	
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3	DATED A 314 2010	
4	DATED: April 4, 2018	
5	Respectfully submitted,	Respectfully submitted,
6	By: <u>/s/ Lisa Kobialka</u>	By: /s/ Rebecca L. Carson
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13	lkobialka@kramerlevin.com	
14	jhannah@kramerlevin.com	
15	Attorneys for Plaintiff FINJAN, INC.	
16		
17		
18	ATTESTATION	
19	In compliance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this	
20	document has been obtained from any other signatory to this document.	
21		
22		/s/ Lisa Kobialka
23		Lisa Kobialka
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1	IT IS SO ORDERED.
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3	Dated:
4	The Honorable William Alsup UNITED STATES DISTRICT JUDGE
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