

1 PAUL J. ANDRE (CBN 196585)  
 2 pandre@kramerlevin.com  
 3 LISA KOBIALKA (CBN 191404)  
 4 lkobialka@kramerlevin.com  
 5 JAMES HANNAH (CBN 237978)  
 6 jhannah@kramerlevin.com  
 7 KRAMER LEVIN NAFTALIS  
 8 & FRANKEL LLP  
 9 990 Marsh Road  
 10 Menlo Park, CA 94025  
 11 Telephone: (650) 752-1700  
 12 Facsimile: (650) 752-1800  
 13  
 14 Attorneys for Plaintiff,  
 15 FINJAN, INC.

IRELL & MANELLA LLP  
 Jonathan S. Kagan (SBN 166039)  
 (jkagan@irell.com)  
 Joshua P. Glucoft (SBN 301249)  
 (jglucoft@irell.com)  
 1800 Avenue of the Stars, Suite 900 Los Angeles,  
 California 90067-4276 Telephone: (310) 277-1010  
 Facsimile: (310) 203-7199  
 Rebecca L. Carson (SBN 254105)  
 (rcarson@irell.com)  
 Kevin Wang (SBN 318024)  
 (kwang@irell.com)  
 840 Newport Center Drive, Suite 400  
 Newport Beach, California 92660-6324  
 Telephone: (949) 760-0991  
 Facsimile: (949) 760-5200

Attorneys for Defendant  
 JUNIPER NETWORKS, 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 Defendants.

Case No.: 3:17-cv-05659-WHA

**STIPULATION AND [PROPOSED]  
 ADDENDUM TO PROTECTIVE ORDER**

Judge: Honorable William Alsup

1           1.       WHEREAS, Plaintiff Finjan, Inc. (“Plaintiff”) has received requests for the production  
2 of documents in this case from Defendant Juniper Networks, Inc. (“Defendant”) (together with  
3 Plaintiff, the “Parties”) that relate to materials generated and produced in the course of Finjan’s prior  
4 litigation with non-party Proofpoint, Inc. (“Proofpoint”) (Case No. 4:13-cv-05808-HSG (N.D. Cal.))  
5 and that contain Proofpoint’s highly sensitive and confidential business information;

6           2.       WHEREAS, Proofpoint seeks protection from disclosure of its highly confidential  
7 business information to Defendant’s in-house counsel under the terms of the Protective Order in effect  
8 in the present litigation, which at the time of this filing is the Patent Local Rule 2-2 Interim Model  
9 Protective Order, which allows designated in-house counsel of the parties to access Highly  
10 Confidential – Attorneys’ Eyes Only materials;

11           3.       WHEREAS, Plaintiff, Defendant, and Proofpoint have met and conferred and agreed to  
12 the following Addendum to the Protective Order governing discovery in the above-captioned litigation  
13 to address Proofpoint’s concerns;

14           4.       THEREFORE, it is hereby agreed by Defendant and ORDERED that dissemination of  
15 any of the following materials, including: information or item designated “CONFIDENTIAL,”  
16 “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY,” or “HIGHLY CONFIDENTIAL –  
17 ATTORNEYS’ EYES ONLY – SOURCE CODE” by Proofpoint in the prior litigation captioned  
18 *Finjan, Inc. v. Proofpoint, Inc., et al.*, Case No. 4:13-cv-05808-HSG (N.D. Cal.); the settlement  
19 agreement and related drafts and correspondence between Plaintiff, Proofpoint, and/or their respective  
20 counsel; or any other materials produced by Finjan in this matter that otherwise contain or refer to the  
21 confidential business information of Proofpoint (collectively, “Proofpoint Protected Material”) shall be  
22 limited to the qualified recipients enumerated in Paragraphs 7.3(a), (c), (d), (e), and (f) set forth in the  
23 Patent Local Rule 2-2 Interim Model Protective Order. For the avoidance of doubt, Proofpoint  
24 Protected Material may not be disclosed to or accessible by any in-house counsel or employee of  
25 Defendant. Additionally, Plaintiff’s access to Proofpoint Protected Material produced by Proofpoint  
26 shall continue to be governed under the terms of the Protective Order issued at Dkt. No. 96 in *Finjan,*  
27 *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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4 DATED: April 4, 2018

5 Respectfully submitted,

6 By: /s/ Lisa Kobialka  
7 Paul Andre (State Bar. No. 196585)  
8 Lisa Kobialka (State Bar No. 191404)  
9 James Hannah (State Bar No. 237978)  
10 KRAMER LEVIN NAFTALIS &  
11 FRANKEL LLP  
12 990 Marsh Road  
13 Menlo Park, CA 94025  
14 Telephone: (650) 752-1700  
15 Facsimile: (650) 752-1800  
16 pandre@kramerlevin.com  
17 lkobialka@kramerlevin.com  
18 jhannah@kramerlevin.com

19 *Attorneys for Plaintiff*  
20 FINJAN, INC.

Respectfully submitted,

By: /s/ Rebecca L. Carson  
Rebecca L. Carson (SBN 254105)  
(rcarson@irell.com)  
840 Newport Center Drive, Suite 400  
Newport Beach, CA 92660-6324  
Tel: (949) 760-0991 | Fax: (949) 760-5200

*Attorneys for Defendant*  
JUNIPER NETWORKS, INC.

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**ATTESTATION**

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

/s/ Lisa Kobialka  
Lisa Kobialka

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**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
The Honorable William Alsup  
UNITED STATES DISTRICT JUDGE