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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.
23

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:

8 Identification of Documents	9 Specific Page and Line Numbers to Seal	10 Entity that Designated the Information to be Confidential	11 Reason to Keep Sealed
12 Plaintiff Finjan, Inc.’s Response to Order to Show Cause	13 Page 1, line 10 through Page 11, Line 10	14 Juniper	15 Describes information that Juniper produced with a confidentiality designation.
16 The Declaration of Michael Mitzenmacher filed in support of Plaintiff Finjan, Inc.’s Response to Order to Show Cause	17 Paragraphs 15-25, 28-30, 32-34, 36-76, 78-97, and 99-112	18 Juniper	19 Describes information that Juniper produced with a confidentiality designation.
20 Exhibit 5 to the Declaration of Kristopher Kastens filed in support of Plaintiff Finjan, Inc.’s Response to Order to Show Cause	21 The Entire Exhibit 5	22 Juniper	23 Produced by Juniper with a confidentiality designation of “Highly Confidential – Source Code”
24 Exhibits 8, 14-16, and 18 to the Declaration of Kristopher Kastens filed in support of Plaintiff Finjan, Inc.’s Response to Order to Show Cause	25 The Entire Exhibits 8, 14-16, and 18	26 Juniper	27 Produced by Juniper with a confidentiality designation of “Highly Confidential – Attorneys’ Eyes Only”

28 **II. ARGUMENT**

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

33 Finjan seeks to seal the documents described above because they contain information that

1 Juniper has designated as “Confidential,” “Highly Confidential – Attorneys’ Eyes Only,” or “Highly
2 Confidential – Source Code.” Specifically, these designated documents contain information on the
3 operation of Juniper’s products and its source code, the public disclosure of which Juniper claims could
4 harm its business. Pursuant to Civil Local Rule 79-5, Finjan has filed publicly the relevant excerpts of
5 information that are not confidential. Attached hereto are redacted and unredacted versions of the
6 documents set forth above.

7 **III. CONCLUSION**

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

10 Respectfully submitted,

11
12 Dated: May 13, 2019

By: /s/ Kristopher Kastens

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