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10 *Attorneys for Plaintiff*
11 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 Response to Order to Show Cause, pursuant to Civil Local Rules 79-5(d)-(e).

6 3. I have reviewed the following documents and confirmed that they contain information
7 designated as “Confidential,” “Highly Confidential – Attorneys’ Eyes Only,” or “Highly Confidential –
8 Source Code” by Juniper pursuant to the stipulated protective order in this litigation.

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

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

27 5. Finjan seeks to seal the documents described above because they contain information that
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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.

5 I declare under penalty of perjury under the laws of the United States of America that each of the
6 above statements is true and corrected. Executed on May 13, 2019, in Menlo Park, California.

7 /s/ Kristopher Kastens
8 Kristopher Kastens
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