

1 PAUL J. ANDRE (State Bar No. 196585)
pandre@kramerlevin.com
2 LISA KOBIALKA (State Bar No. 191404)
lkobialka@kramerlevin.com
3 JAMES HANNAH (State Bar No. 237978)
jhannah@kramerlevin.com
4 KRISTOPHER KASTENS (State Bar No. 254797)
kkastens@kramerlevin.com
5 KRAMER LEVIN NAFTALIS & FRANKEL LLP
6 990 Marsh Road
7 Menlo Park, CA 94025
8 Telephone: (650) 752-1700
9 Facsimile: (650) 752-1800
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

**[PROPOSED] ORDER GRANTING
PLAINTIFF FINJAN, INC.'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

1 Plaintiff Finjan, Inc.’s (“Finjan”) Administrative Motion to File Documents Under Seal was
 2 brought before this Court. Upon consideration of this motion and the supporting declaration of
 3 Kristopher Kastens filed in support of the motion, the Court finds there to be good cause and compelling
 4 reasons for granting the request to file certain documents under seal.

5 GOOD CAUSE and compelling reasons having been shown, the Court finds that:

6 1. There exist overriding confidentiality interests that have overcome the right of public
 7 access to the record of the following documents:

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 Response to Order to Show Cause	Page 1, line 10 through Page 11, Line 10	Juniper	Describes information that Juniper produced with a confidentiality designation.
The declaration of Michael Mitzenmacher filed in support of Plaintiff Finjan, Inc.’s Response to Order to Show Cause	Paragraphs 15-25, 28-30, 32-34, 36-76, 78-97, and 99-112	Juniper	Describes information that Juniper produced with a confidentiality designation.
Exhibit 5 to the Declaration of Kristopher Kastens filed in support of Plaintiff Finjan, Inc.’s Response to Order to Show Cause	The Entire Exhibit 5	Juniper	Produced by Juniper with a confidentiality designation of “Highly Confidential – Source Code”
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	The Entire Exhibits 8, 14-16, and 18	Juniper	Produced by Juniper with a confidentiality designation of “Highly Confidential – Attorneys’ Eyes Only”

23 2. A substantial probability exists that the overriding confidentiality interests will be
 24 prejudiced if the record is not sealed;

25 3. The proposed sealing is narrowly tailored; and

26 4. No less restrictive means exist to achieve these overriding interests.

1 IT IS THEREFORE ORDERED that Finjan's Administrative Motion to File Documents Under
2 Seal is GRANTED with respect to the documents set forth above. IT IS SO ORDERED.

3
4 DATED: _____

By: _____
Hon. William Alsup
United States District Judge

5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28