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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.**

2
3
4 DATED: April 4, 2018

5 Respectfully submitted,

6 By: /s/ Lisa Kobialka
7 Paul Andre (State Bar. No. 196585)
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21 **ATTESTATION**

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

24 /s/ Lisa Kobialka
25 Lisa Kobialka

26 **IT IS SO ORDERED.**

27 Dated: April 5, 2018.

28 
The Honorable William Alsup
UNITED STATES DISTRICT JUDGE