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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

FINJAN, INC.

Plaintiff,

vs.

JUNIPER NETWORKS, INC.

Defendant.

Case No. C 17-05659 WHA

NON-PARTY JOE SECURITY, LLC'S
SUBMISSION IN SUPPORT OF
MOTION TO FILE UNDER SEAL (DKT
513)

Non-party Joe Security, LLC ("Joe Security") hereby submits the attached Second Declaration of Stefan Buehlmann explaining the confidential nature and trade secret status of the Joe Security information included in the deposition of Khurrah Islah.¹ Mr. Islah is a software developer at Juniper Networks who is familiar with Juniper's use of the Joe Security's Joe Sandbox system, a malware analysis and detection system. Mr. Islah's deposition testimony describes the confidential and trade secret details of Joe Security's Joe Sandbox product throughout the deposition. *See* Bühlmann Decl., ¶¶ 10, 11 (Exhibit 1 hereto).

Joe Security respectfully requests that this Court allow the Islah deposition to be filed under seal. In the alternative, Joe Security requests that the Court allow Joe Security to redact

¹ Joe Security is not a party to this action and has no presence in California. Joe Security is appearing for the limited reason of establishing the trade secret status and highly confidential nature of its information in the Islah deposition, and expressly contests personal jurisdiction in this Court.

1 the most sensitive information from the transcript, which will likely be more than 50% of the
2 transcript.

3 CONCLUSION

4 Joe Security submits that the foregoing presents “compelling reasons” sufficient to justify
5 having the Islah transcript filed under seal, and respectfully request that the motion to file under
6 seal be granted.

7 Dated: June 7, 2019

Respectfully submitted,

8 JOE SECURITY, LLC

9 by its attorneys,

10 s/Philip C. Swain

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CERTIFICATE OF SERVICE

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants, if any, on this 7th day of June, 2019.

/s/ Philip C. Swain

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NON-PARTY JOE SECURITY'S SUBMISSION IN SUPPORT OF MOTION TO FILE UNDER SEAL – CASE
NO. C17-05659 WHA