

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

**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 confidential information of Defendant Juniper Networks,
5 Inc. (“Juniper”). Specifically, there exist good cause and compelling reasons to file the following
6 document under seal:

Identification of Documents to be Sealed	Entity that Designated the Information to be Confidential
Exhibit 2 to the Joint Discovery Letter Related to Financials and other Damages Related Discovery.	Juniper
Exhibit 3 to the Joint Discovery Letter Related to Financials and other Damages Related Discovery.	Juniper

14 **II. ARGUMENT**

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

19 Finjan seeks to seal Exhibits 2 and 3 to the Joint Discovery Letter Related to Financials and
20 other Damages Related Discovery, because these Exhibits contain information that Juniper has
21 designated as “Highly Confidential – Attorneys’ Eyes Only.” Specifically, this information contains
22 descriptions or quotes from Juniper’s employees concerning Juniper’s financial and sales information,
23 the public disclosure of which Juniper claims could harm its business.

24 Pursuant to Civil Local Rule 79-5, Finjan has filed publicly the relevant excerpts of information
25 that are not confidential. Attached hereto are redacted and unredacted versions of the documents set
26 forth above.

1 **III. CONCLUSION**

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

4 Respectfully submitted,

5 Dated: June 14, 2019

6 By: /s/ Yuridia Caire

7 Paul J. Andre (State Bar No. 196585)
8 Lisa Kobialka (State Bar No. 191404)
9 James Hannah (State Bar No. 237978)
10 Kristopher Kastens (State Bar No. 254797)
11 Yuridia Caire (State Bar No. 268881)
12 KRAMER LEVIN NAFTALIS
13 & FRANKEL LLP
14 990 Marsh Road
15 Menlo Park, CA 94025
16 Telephone: (650) 752-1700
17 Facsimile: (650) 752-1800
18 pandre@kramerlevin.com
19 lkobialka@kramerlevin.com
20 jhannah@kramerlevin.com
21 kkastens@kramerlevin.com
22 ycaire@kramerlevin.com

23 *Attorneys for Plaintiff*
24 FINJAN, INC.