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13 *Attorneys for Defendant*
 JUNIPER NETWORKS, INC.

14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**
 16 **SAN FRANCISCO DIVISION**

17 FINJAN, INC.,)	Case No. 3:17-cv-05659-WHA
)	
18 Plaintiff,)	NOTICE REGARDING STATUS OF
)	PROTECTIVE ORDER
19 v.)	
)	
20 JUNIPER NETWORKS, INC.,)	Hon. William H. Alsup
)	
21 Defendant.)	
)	

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NOTICE REGARDING STATUS OF PROTECTIVE ORDER

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2 Defendant Juniper Networks, Inc. (“Juniper”) respectfully provides this Notice to the Court
3 regarding the status of the parties’ negotiation of a stipulated Protective Order. Attached hereto is
4 the most recent version of the parties’ negotiated Protective Order. As of the filing of this Notice,
5 there are only three outstanding provisions with competing proposals: (i) Section 2.7 regarding the
6 definition of “Expert”; (ii) Section 2.9 regarding the definition of “source code”; and (iii) Section
7 8 regarding the prosecution bar. In each case, Juniper proposes adopting the Model Protective
8 Order while plaintiff Finjan, Inc. (“Finjan”) proposes deviating from the Model Protective Order.

9 This Notice is not a joint submission, as Finjan did not agree to submit the Protective
10 Order in its current state because Finjan indicated that it may have additional compromise
11 proposals. The parties will confer to try to reduce the number of outstanding issues and will notify
12 the Court if the parties are able to reach resolution. However, the parties have been conferring
13 regarding the Protective Order for nearly two months and the deadline by which the parties had
14 agreed to submit a proposed Protective Order has long since passed. *See* Dkt. No. 31 at p. 8 (“The
15 parties intend to file the stipulated Protective Order (with competing provisions if necessary) by
16 March 5, 2018.”). This Notice is therefore provided to keep the Court apprised of all relevant
17 information.

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19 Dated: April 13, 2018

Respectfully submitted,

IRELL & MANELLA LLP

21 By: /s/ Joshua Glucoft
22 Joshua Glucoft
23 *Attorneys for Defendant*
24 Juniper Networks, Inc.