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11 FINJAN, INC.

12
13 **IN THE UNITED STATES DISTRICT COURT**
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16 FINJAN, INC., a Delaware Corporation,

17 Plaintiff,

18 v.

19 JUNIPER NETWORKS, INC., a Delaware
20 Corporation,

21 Defendant.
22

Case No.: 3:17-cv-05659-WHA-TSH

**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 Juniper. Specifically, there exist
5 good cause and compelling reasons to file the following document under seal:

Identification of Documents to be Sealed	Entity that Designated the Information to be Confidential
Joint Discovery Statement to Compel Responses from Defendant Juniper Networks, Inc.’s to Finjan’s Discovery Requests Related to Financials and Other Damages-Related Discovery, at pp. 3, 4.	Defendant Juniper Networks, Inc. (“Juniper”)
Exhibit C to Joint Discovery Statement to Compel Responses from Defendant Juniper Networks, Inc.’s to Finjan’s Discovery Requests Related to Financials and Other Damages-Related Discovery, at p. 13 ln. 18 – p. 22 ln. 18.	Juniper
Exhibit D to Joint Discovery Statement to Compel Responses from Defendant Juniper Networks, Inc.’s to Finjan’s Discovery Requests Related to Financials and Other Damages-Related Discovery, at p. 7 ln. 25 – p. 18 ln. 23.	Juniper
Exhibit 1 to Joint Discovery Statement to Compel Responses from Defendant Juniper Networks, Inc.’s to Finjan’s Discovery Requests Related to Financials and Other Damages-Related Discovery, at p. 13 ln. 24 – p. 24 ln. 21.	Juniper

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20 **II. ARGUMENT**

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

25 Finjan seeks to seal portions of Joint Discovery Statement to Compel Responses from
26 Defendant Juniper Networks, Inc.’s to Finjan’s Discovery Requests Related to Financials and Other
27 Damages-Related Discovery and exhibits C, D, and 1 attached thereto, because these documents

1 contain information that Juniper has designated as “Highly Confidential – Attorneys’ Eyes Only.”
2 Specifically, this information contains descriptions of Juniper’s financial and technical information, the
3 public disclosure of which Juniper claims could harm its business.

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

7 **III. CONCLUSION**

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

10 Respectfully submitted,

11 Dated: June 25, 2019

12 By: /s/ Yuridia Caire

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