

1 PAUL ANDRE (State Bar No. 196585)
2 pandre@kramerlevin.com
3 LISA KOBIALKA (State Bar No. 191404)
4 lkobialka@kramerlevin.com
5 JAMES HANNAH (State Bar No. 237978)
6 jhannah@kramerlevin.com
7 KRISTOPHER KASTENS (State Bar No. 254797)
8 kkastens@kramerlevin.com
9 YURIDIA CAIRE (State Bar No. 268881)
10 ycaire@kramerlevin.com
11 KRAMER LEVIN NAFTALIS & FRANKEL LLP
12 990 Marsh Road
13 Menlo Park, CA 94025
14 Telephone: (650) 752-1700
15 Facsimile: (650) 752-1800

16 *Attorneys for Plaintiff*
17 FINJAN, INC.

18 **IN THE UNITED STATES DISTRICT COURT**
19 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 FINJAN, INC., a Delaware Corporation,

22 Plaintiff,

23 v.

24 JUNIPER NETWORKS, INC., a Delaware
25 Corporation,

26 Defendant.

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

**[PROPOSED] ORDER GRANTING
PLAINTIFF FINJAN, INC.'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

1 Plaintiff Finjan, Inc.’s (“Finjan”) Administrative Motion to File Documents Under Seal was
 2 brought before this Court. Upon consideration of this motion and the supporting declaration of
 3 Kristopher Kastens filed in support of the motion, the Court finds there to be good cause for granting
 4 the request to file certain documents under seal.

5 Good cause having been shown, the Court finds that:

6 1. There exists overriding confidentiality interests that overcome the right of public access
 7 to the record of the following document:

Identification of Documents or Portions of Document 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

24
 25 2. A substantial probability exists that the overriding confidentiality interests will be
 26 prejudiced if the record is not sealed;

27 3. The proposed sealing is narrowly tailored; and

1 4. No less restrictive means exist to achieve these overriding interests.
2

3 IT IS THEREFORE ORDERED that Finjan's Administrative Motion to File Documents Under
4 Seal is GRANTED with respect to the document set forth above. IT IS SO ORDERED.
5

6 DATED: _____
7

8 Honorable Thomas S. Hixson
9 United States District Court Magistrate Judge
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28