

DECLARATION OF INGRID PETERSEN

I, Ingrid Petersen, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Juniper Networks, Inc. (“Juniper”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice before this Court. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I submit this declaration in support of Finjan, Inc.’s (“Finjan”) Administrative Motion to File Documents Under Seal (Dkt. No. 559).

3. I have reviewed the portions of the documents that Finjan has sought to seal, and I believe that, regarding Juniper’s confidential information, the following should be sealed:

Document	Portion to Be Sealed	Juniper’s Basis for Sealing
Joint Letter (Docket No. 559-4)	Chart on Page 4	Juniper’s Confidential Pricing Information
Exhibit C (Docket No. 559-6)	Section between “Begin” and “End” Highly Confidential—Attorney’s Eyes Only from Pages 13 to 22	Juniper’s Confidential Pricing Information
Exhibit D (Docket No. 559-8)	Section between “Begin” and “End” Highly Confidential—Attorney’s Eyes Only from Pages 7 to 18	Juniper’s Confidential Pricing Information
Exhibit 1 (Docket No. 559-10)	Section between “Begin” and “End” Highly Confidential—Attorney’s Eyes Only from Pages 13 to 24	Juniper’s Confidential Pricing Information

4. I am informed and believe that the right of the public to inspect and copy public records “is not absolute” and that a court may seal confidential information disclosed during the course of a legal proceeding. *Nixon v. Warner Commc’ns, Inc.*, 435 U.S. 589, 598 (1978).

5. Because Juniper’s opposition concerns a motion to compel responses to discovery requests, I understand that “the usual presumption of the public’s right of access is rebutted,” that the “public has less of a need for access to court records attached only to non-dispositive motions,” and that the “public policies that support the right of access to dispositive motions, and related materials, do not apply with equal force to non-dispositive materials.” *See Kamakana v. City & Cty.*

