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9 *Attorneys for Plaintiff*
10 FINJAN, INC.

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

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15
16 FINJAN, INC., a Delaware Corporation,

17 Plaintiff,

18 v.

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

21 Defendant.

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

**DECLARATION OF KRISTOPHER
KASTENS IN SUPPORT OF PLAINTIFF
FINJAN, INC.'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS UNDER
SEAL**

1 I, Kristopher Kastens, declare:

2 1. I have personal knowledge of the facts stated herein and can testify competently to
3 those facts. I am an attorney at Kramer Levin Naftalis & Frankel LLP, counsel of record for
4 Finjan, Inc. (“Finjan”). I make this declaration in support of Plaintiff Finjan, Inc.’s Motion to file
5 under seal certain documents relating to Plaintiff Finjan’s Motion for Leave to Supplement
6 Infringement Contentions, pursuant to Civil Local Rules 79-5(d)-(e) and this Court’s Standing
7 Order on Administrative Motions to File Under Seal.

8 2. I have reviewed this Court’s Standing Order on Administrative Motions to File
9 Under Seal.

10 3. I have reviewed this District’s Civil Local Rule 79-5.

11 4. I have reviewed the following documents and confirmed that they contain
12 information designated as “Highly Confidential – Attorneys’ Eyes Only” or “Highly Confidential
13 – Attorneys’ Eyes Only – Source Code” by Defendant Juniper Networks, Inc. (“Juniper”)
14 pursuant to the stipulated protective order in this litigation.

Identification of Documents to be Sealed	Entity that Designated the Information to be Confidential
Finjan’s Motion for Leave to Supplement Infringement Contentions at page 5 line 13 through page 6 line 2	Juniper
Ex. A to Declaration of Kristopher Kastens in Support of Plaintiff Finjan Inc.’s Motion for Leave to Supplement Infringement Contentions	Juniper

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

25 6. Finjan seeks to seal the portions identified in the table above, because these
26 portions and documents contain descriptions and discussion of Juniper’s product designs, which
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1 Juniper claims is protectable as a trade secret or otherwise entitled to protection, such that the
2 public disclosure of this information could harm its business.

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4 I declare under penalty of perjury under the laws of the United States of America that each
5 of the above statements is true and correct. Executed on July 11, 2019, in Menlo Park, California.

6 /s/ Kristopher Kastens
7 Kristopher Kastens
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