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JUNIPER NETWORKS, INC.

12 **UNITED STATES DISTRICT COURT**  
13  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15  
16 **SAN FRANCISCO DIVISION**

16 FINJAN, INC.,  
17  
18 Plaintiff,  
19  
20 v.  
21 JUNIPER NETWORKS, INC.,  
22  
23 Defendant.

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

**STIPULATION AND ~~PROPOSED~~  
ORDER REGARDING AMENDING  
PROTECTIVE ORDER RELATED TO  
PRODUCTION OF THIRD PARTY  
SYMANTEC CORPORATION  
CONFIDENTIAL INFORMATION**

1 By and through their respective undersigned counsel, Plaintiff Finjan, Inc. (“Finjan”) and  
2 Defendant Juniper Networks, Inc. (“Juniper”) (collectively, the “Parties”), in an effort to facilitate the  
3 production of third party confidential information, hereby stipulate and agree as follows:

4 WHEREAS, Finjan filed this lawsuit against Juniper on September 29, 2017, alleging  
5 infringement of certain Finjan patents;

6 WHEREAS, Finjan previously sued Symantec Corporation (“Symantec”) in *Finjan, Inc. v.*  
7 *Symantec Corp.*, Case No. 4:14-cv-02998-HSG (N.D. Cal.) and *Finjan, Inc. v. McAfee Inc. et al.*, 1:10-  
8 cv-00593-GMS (D. Del.), and Blue Coat Systems, Inc. (“Blue Coat”) in *Finjan, Inc. v. Blue Coat*  
9 *Systems, Inc.*, Case No. 5:13-cv-03999-BLF and *Finjan, Inc. v. Blue Coat Systems, Inc.*, Case No.  
10 5:15-cv-003295-BLF, alleging infringement of overlapping and related patents to the Finjan patents  
11 asserted in the present action;

12 WHEREAS, Symantec acquired Blue Coat in August 2016;

13 WHEREAS, Juniper’s First Set of Requests for Production to Finjan requests certain  
14 documents from Finjan’s previous lawsuits that include Symantec and Blue Coat confidential  
15 information;

16 WHEREAS, Symantec objects to Designated House Counsel accessing documents containing  
17 Symantec and Blue Coat confidential information under the “Highly Confidential – Attorneys’ Eyes  
18 Only” designation in the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”) or  
19 under a similar provision in a subsequent protective order;

20 WHEREAS, the Parties agree that documents containing Symantec and Blue Coat confidential  
21 information may be designated as “Highly Confidential – Outside Attorneys’ Eyes Only” and such  
22 documents will not be disclosed to in-house counsel;

23 THEREFORE, the Parties stipulate to amend the Protective Order and any subsequent  
24 protective order such that documents containing Symantec and Blue Coat confidential information  
25 designated as “Highly Confidential – Outside Attorneys’ Eyes Only” may be disclosed only to those  
26 persons with access to “Highly Confidential – Attorneys’ Eyes Only” and such documents will not be  
27 disclosed to in-house counsel, including Designated House Counsel.

1 **IT IS SO STIPULATED.**

2 KRAMER LEVIN NAFTALIS & FRANKEL LLP

3  
4 Dated: April 16, 2018

By:  /s/ Paul Andre  
Paul Andre

5 Attorneys for Plaintiff  
6 FINJAN, INC.

7  
8 IRELL & MANELLA LLP

9 Dated: April 16, 2018

By:  /s/ Joshua Glucoft  
Joshua Glucoft

11 Attorneys for Defendant  
12 JUNIPER NETWORKS, INC.

13  
14 **ATTESTATION PURSUANT TO CIVIL L.R. 5-1(i)**

15 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
16 document has been obtained from any other signatory to this document.


17  /s/ Paul Andre  
18 Paul Andre

~~**PROPOSED ORDER**~~

Before the Court is the Parties' Stipulation to Amend Protective Order Related to Production of Third Party Symantec Corporation Confidential Information.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: April 18, 2018.

  
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The Honorable William Alsup  
United States District Judge