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11 FINJAN, INC.

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

15 FINJAN, INC., a Delaware Corporation,

16 Plaintiff,

17 v.

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

20 Defendant.

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

**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 Under Seal. The documents identified  
4 below contain confidential information of Juniper Networks, Inc. (“Juniper”). Finjan relies on Juniper’s  
5 confidentiality designation. Specifically, there exists good cause and compelling reasons to file the  
6 following documents under seal:

Identification of Documents to be Sealed	Entity that Designated the Information to be Confidential
Plaintiff Finjan Inc.’s Motion for Leave to File Second Amended Complaint at page 3, lines 17-20; page 6, lines 1, 3	Juniper
Declaration of Kristopher Kastens (“Kastens Decl.”), Ex. 2 (excerpts from deposition transcript of Ms. Yuly Tenorio) in its entirety.	Juniper
Kastens Decl., Ex. 1 (“Second Amended Complaint”) at ¶¶132–136	Juniper
Kastens Decl., Ex. 5 (Redline of Second Amended Complaint) at ¶¶132–136.	Juniper
Exs. 33 and 34 to the Second Amended Complaint	Juniper

15 **II. ARGUMENT**

16 This Administrative Motion to File Documents Under Seal should be granted because there is  
17 good cause and compelling reasons to seal the identified documents. Finjan seeks to seal only those  
18 documents and portions of documents that Juniper has identified as containing confidential information  
19 pursuant to the Interim Model Protective Order.

20 Finjan seeks to seal Finjan’s Motion for Leave to File Second Amended Complaint redacted  
21 portions at page 3, lines 17-20 and page 6, lines 1, 3 because, as set forth in the accompanying  
22 declaration of Kristopher Kastens in Support of this Administrative Motion (“Kastens Sealing  
23 Declaration”), these portions contain information that Juniper has designated as “Highly Confidential –  
24 Attorneys’ Eyes Only.”

25 Finjan seeks to seal Exhibits 1, 2, 5 to the Kastens Declaration and Exhibits 33 and 34 to the  
26 Second Amended Complaint because, as set forth in the accompanying Kastens Sealing Declaration,  
27 these documents contain information that Juniper has designated as “Highly Confidential – Attorneys’  
28

1 Eyes Only” or “Highly Confidential – Source Code.”

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

5 **III. CONCLUSION**

6 For the foregoing reasons, Finjan respectfully requests that the Court grant its Administrative  
7 Motion to File Documents Under Seal.

8  
9 Respectfully submitted,

10 Dated: May 31, 2018

11 By: /s/ Kristopher Kastens

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