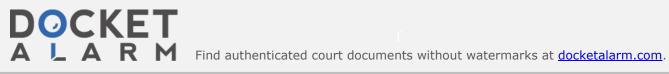
| 1  | PAUL J. ANDRE (State Bar No. 196585)                                 |                               |  |
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| 4  | ihannah@kramerlevin.com<br>KRISTOPHER KASTENS (State Bar No. 254797) |                               |  |
| 5  |  |                               |  |
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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 SAN FRANCISCO DIVISION       |                               |  |
| 13 |  |                               |  |
| 14 |  |                               |  |
| 15 |  |                               |  |
|    | FINJAN, INC., a Delaware Corporation,                                | Case No.: 3:17-cv-05659-WHA   |  |
| 16 | Plaintiff,   | PLAINTIFF FINJAN, INC.'S      |  |
| 17 |  | ADMINISTRATIVE MOTION TO FILE |  |
| 18 | V.   | DOCUMENTS UNDER SEAL          |  |
| 19 | JUNIPER NETWORKS, INC., a Delaware Corporation,                      |                               |  |
|    | Corporation,   |                               |  |
| 20 | Defendant.   |                               |  |
| 21 |  |                               |  |
| 22 |  |                               |  |
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|    |  |                               |  |



## I. INTRODUCTION

Pursuant to Federal Rule of Civil Procedure 26(c), Civil Local Rules 7-11 and 79-5, Plaintiff, Finjan, Inc. ("Finjan"), brings this Administrative Motion to File Under Seal. The documents identified below contain confidential information of Juniper Networks, Inc. ("Juniper"). Finjan relies on Juniper's confidentiality designation. Specifically, there exists good cause and compelling reasons to file the following documents under seal:

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

## II. ARGUMENT

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

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

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



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Eyes Only" or "Highly Confidential – Source Code." Pursuant to Civil Local Rule 79-5, Finjan has filed publicly the relevant excerpts of information

that are not confidential. Attached hereto are redacted and unredacted versions of the documents set forth above.

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## III. **CONCLUSION**

Dated: May 31, 2018

Motion to File Documents Under Seal.

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Respectfully submitted,

By: /s/ Kristopher Kastens

For the foregoing reasons, Finjan respectfully requests that the Court grant its Administrative

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James Hannah (State Bar No. 237978)

Kristopher Kastens (State Bar No. 254797)

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