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 15 **UNITED STATES DISTRICT COURT**  
 16 **NORTHERN DISTRICT OF CALIFORNIA**  
 17 **SAN FRANCISCO DIVISION**

18	FINJAN, INC.,	)	Case No. 3:17-cv-05659-WHA
19	Plaintiff,	)	<b>DECLARATION OF SHARON SONG IN SUPPORT OF JUNIPER NETWORKS, INC.'S MOTION FOR ADMINISTRATIVE RELIEF TO FILE DOCUMENTS UNDER SEAL</b>
20	vs.	)	
21	JUNIPER NETWORKS, INC.,	)	
22	Defendant.	)	
23		)	

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**DECLARATION OF SHARON SONG**

I, Sharon Song, 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 matter. 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 Juniper’s June 7, 2018 Motion for Administrative Relief to File Documents Under Seal, which asks the Court for an Order to file under seal the following documents:

- Juniper’s unredacted Motion for Summary Judgment Regarding Claim 1 of U.S. Patent No. 6,804,780 (the “Brief”);
- Exhibit 5 to the Brief (excerpts from the deposition transcript of Finjan employee John Garland);
- Unredacted Exhibit 6 to the Brief (excerpts from the deposition transcript of Juniper employee Raju Manthena);
- Unredacted Exhibit 7 to the Brief (excerpts from Juniper’s Notice of Specific Unmarked Products under *Arctic Cat, Inc. v. Bombardier Recreational*);
- Exhibit 8 to the Brief (excerpts from Finjan’s Objections and Responses to Juniper’s First Set of Interrogatories);
- Exhibit 19 to the Brief (excerpts from Finjan’s First Supplemental Objections and Responses to Juniper’s First Set of Interrogatories);
- Unredacted Declaration of Ariel D. Rubin in support of the Brief;
- Unredacted Declaration of Rebecca Carson in support of the Brief;
- Unredacted Declaration of Yuly Nerida Becerra Tenorio in support of the Brief.

3. The sealed portions of the documents described above that Juniper seeks to file under seal contain confidential information of Juniper and Finjan. In this declaration, I explain why these materials are sealable pursuant to Civil Local Rule 79-5.

1           4.       Exhibit 5 to the Brief are excerpts of the deposition transcript of Finjan employee  
2 John Garland that have been designated confidential by Finjan.

3           5.       The redacted portions of Exhibit 6 to the Brief are excerpts of the deposition  
4 transcript of Juniper employee Raju Manthena that include discussion of Juniper's confidential  
5 technical information related to Juniper's highly proprietary software.

6           6.       The redacted portions of Exhibit 7 to the Brief are excerpts from Juniper's Notice  
7 of Specific Unmarked Products under *Arctic Cat, Inc. v. Bombardier Recreational* that have been  
8 designated confidential by Finjan.

9           7.       Exhibit 8 to the Brief are excerpts from Finjan's Objections and Responses to  
10 Juniper's First Set of Interrogatories that have been designated confidential by Finjan.

11          8.       Exhibit 19 to the Brief are excerpts from Finjan's First Supplemental Objections  
12 and Responses to Juniper's First Set of Interrogatories that have been designated confidential by  
13 Finjan.

14          9.       The redacted portion of the Declaration of Ariel D. Rubin in support of the Brief  
15 comprised of the last two lines of paragraph 96 has been designated confidential by Finjan. All  
16 other redacted portions of the Declaration of Ariel D. Rubin include discussion of Juniper's  
17 confidential technical information related to Juniper's highly proprietary software.

18          10.      The redacted portions of the Declaration of Yuly Nerida Becerra Tenorio in support  
19 of the Brief include discussion of Juniper's confidential technical information related to Juniper's  
20 highly proprietary software.

21          11.      The redacted portions of the Declaration of Rebecca Carson in support of the Brief  
22 include discussion of Juniper's confidential financial information related to Juniper's highly  
23 proprietary software.

24          12.      The redacted portions of the Brief directly reference the confidential materials  
25 discussed above. The redacted portions of the Brief at 24:26-25:3 and 25:7-15 have been  
26 designated confidential by Finjan. All other redacted portions of the Brief include discussion of  
27 Juniper's confidential technical information related to Juniper's highly proprietary software.  
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1           13.     The redacted portions of Exhibits 6; the redacted portions of the Declarations of  
2 Rebecca Carson, Ariel D. Rubin (excluding the last two lines of paragraph 96), and Yuly Nerida  
3 Becerra; and the redacted portions of the Brief (excluding the redactions at 24:26-25:3 and 25:7-  
4 15) contain sealable confidential information that relate to the technical underpinnings and  
5 development of Juniper’s highly proprietary software—which includes much information that  
6 Juniper maintains as trade secrets. Juniper expends significant effort in maintaining the secrecy of  
7 its software architecture and development, including, for example, implementing strict screening  
8 procedures for visitors to its engineering campus. Public disclosure of essential nonpublic facts  
9 about Juniper’s software development could materially impair Juniper’s intellectual property  
10 rights and could cause serious competitive consequences to Juniper’s business positioning.

11           14.     Exhibits 5, 8, and 19; the redacted portions of Exhibit 7; the redacted portions of  
12 the Brief at 24:26-25:3 and 25:7-15; and the redacted portion of the Declaration of Ariel D. Rubin  
13 comprised of the last two lines of paragraph 96 were designated confidential by Finjan.

14           15.     For these reasons, the documents described above should be filed under seal.  
15 Executed on June 7, 2018, at Los Angeles, California.

16           I declare under penalty of perjury under the laws of the United States of America that the  
17 foregoing is true and correct to the best of my knowledge.

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*/s/ Sharon Song*  
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Sharon Song