1	PAUL J. ANDRE (State Bar No. 196585)		
2	pandre@kramerlevin.com LISA KOBIALKA (State Bar No. 191404)		
3	lkobialka@kramerlevin.com		
4	JAMES HANNAH (State Bar No. 237978) <u>ihannah@kramerlevin.com</u>		
	KRISTOPHER KASTENS (State Bar No. 254797)		
5	kkastens@kramerlevin.com   KRAMER LEVIN NAFTALIS & FRANKEL LLP		
6	990 Marsh Road		
7	Menlo Park, CA 94025 Telephone: (650) 752-1700		
8	Facsimile: (650) 752-1800		
9	Attorneys for Plaintiff		
10	FINJAN, INC.		
11			
12	IN THE UNITED STATES DISTRICT COURT		
13	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
	SAN FRANCISCO DIVISION		
14			
15	FINJAN, INC., a Delaware Corporation,	Case No.: 3:17-cv-05659-WHA	
16	Plaintiff,	PLAINTIFF FINJAN, INC.'S	
17	v.	ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL	
18	V.	DOCUMENTS UNDER SEAL	
19	JUNIPER NETWORKS, INC., a Delaware Corporation,		
20	Defendant.		
21			
22			
23			
24			
25			
26			
27			



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 compelling reasons to file the following documents under seal:

Identification of Documents to be Sealed	Entity that Designated the Information to be Confidential
Second Amended Complaint for Patent Infringement, at ¶¶ 132-136 and Exs. 33 and 34	Juniper

## II. ARGUMENT

This Administrative Motion to File Documents Under Seal should be granted because there are 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 ¶¶ 132-136 of its Second Amended Complaint for Patent Infringement and Exhibits 33 and 34 thereto because, as set forth in the accompanying Kastens Declaration, these documents contain information that Juniper has designated as "Highly Confidential – Attorneys' 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.

## III. CONCLUSION

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



## Case 3:17-cv-05659-WHA Document 99 Filed 06/08/18 Page 3 of 3

1		Respectfully submitted,
2	Dated: June 8, 2018 By:	/s/ Paul J. Andre Paul J. Andre (State Bar No. 196585)
3		Lisa Kobialka (State Bar No. 191404)
4		James Hannah (State Bar No. 237978) Kristopher Kastens (State Bar No. 254797)
5		KRAMER LEVIN NAFTALIS & FRANKEL LLP
6		990 Marsh Road Menlo Park, CA 94025
7		Telephone: (650) 752-1700 Facsimile: (650) 752-1800
8		pandre@kramerlevin.com
9		<u>lkobialka@kramerlevin.com</u> <u>jhannah@kramerlevin.com</u>
10		kkastens@kramerlevin.com
11		Attorneys for Plaintiff FINJAN, INC.
12		
13		
14		
15		
16 17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		

