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15 *Attorneys for Defendant*
16 QUALYS INC.

17 **IN THE UNITED STATES DISTRICT COURT**
18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

19 **OAKLAND DIVISION**

21 FINJAN, INC., a Delaware Corporation,)
22) **CASE NO.: 4:18-cv-07229-YGR**
23) **QUALYS'S RENEWED**
24) **ADMINISTRATIVE MOTION TO**
25 QUALYS INC., a Delaware Corporation,) **FILE DOCUMENTS UNDER SEAL**
26) **Defendant**
_____)

1 **I. INTRODUCTION**

2 Pursuant to the Court’s September 17, 2020 Order (ECF 106), Rule 26(c) of the Federal
3 Rules of Civil Procedure, Civil Local Rule 79-5, and the Stipulated Protective Order, Defendant
4 Qualys Inc. (“Qualys”) respectfully brings this Renewed Administrative Motion to File
5 Documents Under Seal. Specifically, there are compelling reasons to file the following portions
6 of the document under seal as identified below:

7

Identification of Documents to be Sealed	Entity That Designated the Information As Confidential
Finjan’s Exhibit 5 to Joint Discovery Statement (ECF 99-6 and 100-5), redacted portions at pp. 1-6, 8-20, 24-27, 29-31, 33-36, 38-44, 47-95, 97-111.	Qualys
Finjan’s Exhibit 8 to Joint Discovery Statement (ECF 99-8 and 100-8), redacted portions at pp. 1-22.	Qualys

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14 **II. ARGUMENT**

15 Qualys seeks to seal portions of documents that contain confidential information
16 designated by Qualys as “Highly Confidential – Outside Counsels’ Eyes Only” as set forth in the
17 above table. Qualys has narrowly tailored its request with this Renewed Administrative Motion
18 seeking to file under seal only those portions of documents containing confidential information
19 pursuant to the Stipulated Protective Order governing treatment of confidential information
20 exchanged during discovery.

21 Attached hereto are unredacted and redacted versions of the above-referenced documents.

22 **III. CONCLUSION**

23 Qualys has shown good cause and compelling reasons for this request to file the above-
24 referenced portions of the documents under seal. This request is narrowly tailored to seal only
25 information that is regarded as confidential. For these reasons, Qualys respectfully requests that
26 the Court grant its Renewed Administrative Motion to File Documents Under Seal.

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Respectfully submitted,

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2 DATED: September 24, 2020

By: /s/ Christopher D. Mays

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Counsel for Defendant

QUALYS INC.

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