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8 *Attorneys for Defendant*  
9 QUALYS INC.

10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
12 **OAKLAND DIVISION**

13 FINJAN, INC.,  
14  
15 Plaintiff,  
16 v.  
17 QUALYS INC.,  
18 Defendant.

) CASE NO.: 4:18-cv-07229-YGR  
)  
) **DECLARATION OF CHRISTOPHER**  
) **MAYS IN SUPPORT OF**  
) **ADMINISTRATIVE MOTION TO**  
) **FILE DOCUMENTS UNDER SEAL**  
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1 I, Christopher Mays, declare as follows:

2 1. I am an attorney with the law firm of Wilson, Sonsini, Goodrich, & Rosati  
3 (“WSGR”), counsel of record for Defendant Qualys Inc. (“Qualys”). I have personal knowledge of  
4 the facts set forth in this declaration and can testify competently to those facts. I make this  
5 declaration in support of Qualys’s Renewed Administrative Motion to File Documents Under Seal  
6 pursuant to Civil Local Rules 79-5(d) and 79-5(e).

7 2. I have reviewed the below documents and confirmed that they contain sealable  
8 information belonging to Qualys. Certain portions of the documents contain confidential business  
9 information that discuss business strategy and the technical details of Qualys’s technology, and are  
10 thus sealable because they contain Qualys’s trade secret information.

11 3. Exhibit 5 to the Joint Discovery Letter is a Qualys internal document containing  
12 confidential business information such as business strategy and technical details of Qualys’s  
13 technology. It also includes confidential analyses of markets in which Qualys competes. As such,  
14 the document contains sensitive competitive information and was internally marked as  
15 CONFIDENTIAL by Qualys at creation. It is therefore sealable as containing Qualys’s trade secret  
16 information as follows: redacted portions on pages 1-6, 8-20, 24-27, 29-31, 33-36, 38-44, 47-95,  
17 97-111.

18 4. Exhibit 8 to the Joint Discovery Letter is a Qualys internal document containing  
19 confidential business and technical information regarding Qualys products. The document was  
20 internally marked QUALYS CONFIDENTIAL – NOT FOR REDISTRIBUTION BEYOND  
21 INTENDED RECIPIENT. It contains Qualys trade secret information about its technical partners  
22 and customer information. Also, the document is a confidential response to a prospective  
23 customer’s request for proposal. As such, it contains Qualys confidential trade secret information,  
24 such as internal sales strategy for its products. Moreover, as this is a response to a third party’s  
25 request for proposal, the document may also implicate that third party’s confidential trade secret  
26 information as well. This document is kept under strict confidentiality and is sealable as containing  
27 Qualys’s trade secret information as follows: redacted portions on pages 1-22.

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