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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

16 FINJAN, INC., a Delaware Corporation,
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18 Plaintiff,
19 v.
20 QUALYS INC., a Delaware Corporation,
21
22 Defendant.

Case No.: 18-cv-07229-YGR (TSH)

**PLAINTIFF FINJAN, INC.'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

Re: Dkt. 106

1 **I. INTRODUCTION**

2 Pursuant to Federal Rule of Civil Procedure 26(c), Civil Local Rules 7-11 and 79-5, and the
 3 Court's order (Dkt. 106) regarding the filing of narrowed redactions to exhibits attached to the Joint
 4 Discovery Letter filed on September 4, 2020 (Dkt. 100), Plaintiff Finjan, Inc. ("Finjan") brings this
 5 Administrative Motion to File Documents Under Seal. The portions of the exhibits to the Joint
 6 Discovery Letter filed on September 4, 2020 identified below contains Finjan's confidential
 7 information. Specifically, there exists good cause to file the following under seal:

Identification of Documents or Portions of Document to be Sealed	Portions of Document to be Sealed	Designating Party	Reasons for Sealing
Exhibit A to Joint Discovery Letter filed on September 4, 2020 (Finjan's Damages Contentions)	Highlighted portions of Exhibit A at pp. 10-11	Finjan	This information contains Finjan's confidential financial information and confidential licensing terms between Finjan and third party licensees or third parties whom Finjan has communicated with regarding its confidential licensing negotiations. This information has been designated by Finjan as "Highly Confidential – Attorneys' Eyes Only."

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 25 The document listed above discloses Finjan's confidential business information.
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1 **II. ARGUMENT**

2 Pursuant to the Court’s order (Dkt. 106), Finjan seeks to seal confidential information within
3 Exhibit A to the Joint Discovery Letter filed on September 4, 2020. Mindful of the Stipulated
4 Protective Order and also Civil Local Rule 79-5, Finjan has filed publicly the relevant excerpts of
5 information that are not confidential. Finjan has narrowly tailored its request with this Administrative
6 Motion, seeking to file under seal only that information that Finjan designated as containing
7 confidential information pursuant to the Stipulated Protective Order.

8 As set forth in the accompanying Declaration of Kristopher Kastens in Support of Finjan’s
9 Administrative Motion to File Documents Under Seal, the portions of Exhibit A to the Joint Discovery
10 Letter designated by Finjan, set forth above, contains confidential financial information and
11 confidential licensing terms between Finjan and third party licensees or third parties whom Finjan has
12 communicated with regarding its confidential licensing negotiations.

13 Pursuant to Civil Local Rule 79-5(e), Finjan is filing this Administrative Motion because the
14 documents contain information that Finjan has designated as “Highly Confidential – Attorneys’ Eyes
15 Only.” To comply with the Stipulated Protective Order in this case, the Finjan is required to make this
16 motion. Consequently, this Administrative Motion should be granted because it is narrowly tailored to
17 cover only the documents for which good cause for filing under seal exist.

18 Attached hereto are redacted and unredacted versions of Exhibit A to the Joint Discovery Letter
19 filed on September 4, 2020.

20 **III. CONCLUSION**

21 Finjan has shown good cause for this request to file the above-referenced document under seal.
22 This request is narrowly tailored to seal only information that is regarded as confidential. For these
23 reasons, Finjan respectfully requests that the Court grant its Administrative Motion to File Under Seal.

Respectfully submitted,

Dated: September 24, 2020

By: /s/ Kristopher Kastens
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