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9 *Attorneys for Plaintiff*
FINJAN, INC.

10 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA

11 FINJAN, INC., a Delaware
12 Corporation,

13 Plaintiff,

14 v.

15 QUALYS INC., a Delaware
16 Corporation,

17 Defendant.
18

Case No. 4:18-cv-07229-YGR (TSH)

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

ACTION REQUESTED

Finjan respectfully requests that Exhibits 3 and 4 to the Declaration of Robert Courtney Supporting Finjan's Motion for Relief from the Magistrate Judge's Discovery Order of September 17, 2020 ("the Courtney Declaration") be filed under seal pursuant to Civil Local Rule 79-5.

POINTS AND AUTHORITIES SUPPORTING THE MOTION

Courts in this District permit the filing under seal of certain documents containing sealable information. Civ. L.R. 79-5(b). Pursuant to Civil Local Rule 79-5(d), Finjan moves to file unredacted versions of the following documents under seal because they contain sealable information as follows:

Document	Portion of Document to be Sealed	Designating Party	Reason for Sealing
Exhibit 3 to the Courtney Declaration (Excerpts from Rough Transcript of D. Bachwani Deposition)	Entirety	Qualys	Designated by Qualys as Highly Confidential—Attorneys' Eyes Only under Protective Order
Exhibit 4 to the Courtney Declaration (Excerpts from Rough Transcript of H. Kruse Deposition)	Entirety	Qualys	Designated by Qualys as Highly Confidential—Attorneys' Eyes Only under Protective Order

Per Civil Local Rule 79-5(d)(A) and 79-5(e), the statements above are confirmed by the accompanying Declaration of Robert Courtney in Support of Finjan's Administrative Motion to File Under Seal, filed contemporaneously herewith. Per Civil Local Rule 79-5(d)(B), a proposed order narrowly tailored to seal only the sealable material, and listing in table format each document or portion thereof that is sought to be sealed, is attached hereto. Per Civil Local Rule 79-

1 5(d)(C) and (D), redacted and unredacted versions of the documents sought to be
2 sealed are attached hereto as exhibits to Mr. Courtney's Declaration.

3 For the reasons given, Finjan respectfully proposes that good cause exists for
4 sealing these documents. This request is narrowly tailored to seal only information
5 that is regarded as confidential. Finjan thus respectfully requests that the Court
6 grant its Administrative Motion to File Under Seal.

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8 Dated: October 1, 2020

/s/ Robert Courtney
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Attorneys for Plaintiff
FINJAN, INC.

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that a true and correct copy of the above and
3 foregoing document has been served on October 1, 2020, to all counsel of record
4 who are deemed to have consented to electronic service via the Court's CM/ECF
5 system. Any other counsel of record will be served by electronic mail and regular
6 mail.

7
8 /s/ Robert Courtney
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11 ***Attorneys for Plaintiff***
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