	Case 4:18-cv-07229-YGR Docume	nt 43 Fi	iled 02/28/20	Page 1 of 3		
1 2 3 4 5 6 7 8 9 10 11 12 13	EDWARD G. POPLAWSKI (SBN 113590) epoplawski@wsgr.com OLIVIA M. KIM (SBN 228382) okim@wsgr.com WILSON SONSINI GOODRICH & ROSA Professional Corporation 633 West Fifth Street, Suite 1550 Los Angeles, CA 90071 Telephone: (323) 210-2901 Facsimile: (866) 974-7329 RYAN R. SMITH (SBN 229323) rsmith@wsgr.com CHRISTOPHER D. MAYS (SBN 266510) cmays@wsgr.com WILSON SONSINI GOODRICH & ROSA Professional Corporation 650 Page Mill Road Palo Alto, CA 94304-1050 Telephone: (650) 493-9300 Facsimile: (650) 493-6811	TI				
13	Attorneys for Defendant					
14	QUALYS INC.					
16	IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION					
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18						
19	FINJAN, INC., a Delaware Corporation,	)	CASE NO.:	4:18-cv-07229-YGR		
20	Plaintiff,	)	DEFENDA	NT QUALYS INC.'S		
21	V.	)	ADMINIST	TRATIVE MOTION TO UMENTS UNDER SEAL		
22		)	FILE DOC	UMENTS UNDER SEAL		
23	QUALYS INC., a Delaware Corporation,	)				
24	Defendant.	)				
25		)				
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I.

## INTRODUCTION

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Civil Local Rules 7-11
and 79-5, and the Stipulated Protective Order (Dkt. 34), Defendant Qualys Inc. ("Qualys")
respectfully brings this Administrative Motion to File Documents Under Seal. Specifically, there
are compelling reasons to file the following document under seal:

6 7	Identification of Documents to be Sealed	Entity That Designated the Information As
8		Confidential
9	Exhibit D to Declaration of Christopher D. Mays in Support of Qualys Inc.'s Motion for Leave to File a Second Amended Answer	Finjan
10		<u> </u>

The above-identified document contains highly confidential information designated by
 Plaintiff Finjan, Inc. ("Finjan") as "Highly Confidential – Attorneys' Eyes Only." or contains
 information so designated by Finjan.

<sup>14</sup> II. ARG

## ARGUMENT

Qualys seeks to seal Exhibit D, a document that Finjan has designated as "Highly
Confidential –Attorneys' Eyes Only." (Mays Decl.<sup>1</sup> at ¶ 3(a).) This request is narrowly tailored
in that it seeks to seal only this one document, regarded as highly confidential pursuant to the
Stipulated Protective Order governing the treatment of confidential information exchanged
during discovery.

<sup>20</sup> III. CONCLUSION

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Qualys has shown good cause and compelling reasons for this request to file the above document under seal. This request is narrowly tailored to seal only information that is regarded

<sup>1</sup> Declaration of Christopher D. Mays in support of this motion to file concurrently hereto.

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## Case 4:18-cv-07229-YGR Document 43 Filed 02/28/20 Page 3 of 3

1					ys respectfully requests that the Court grant its	
2	Administrat	ive Motion	to File Docum	ents Ur	nder Seal.	
3						
4					Respectfully submitted,	
5					WILSON SONSINI GOODRICH & ROSATI	
6					Professional Corporation	
7						
8	DATED:	February 28	8, 2020	By:	/s/ Christopher D. Mays EDWARD D. POPLAWSKI	
9					OLIVIA M. KIM RYAN R. SMITH	
10					CHRISTOPHER D. MAYS	
11					Counsel for Defendant	
12					QUALYS INC.	
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