

1 PAUL ANDRE (State Bar No. 196585)
pandre@kramerlevin.com
2 LISA KOBIALKA (State Bar No. 191404)
lkobialka@kramerlevin.com
3 JAMES HANNAH (State Bar No. 237978)
jhannah@kramerlevin.com
4 AUSTIN MANES (State Bar No. 284065)
amanes@kramerlevin.com
5 KRAMER LEVIN NAFTALIS & FRANKEL LLP
6 990 Marsh Road
7 Menlo Park, CA 94025
8 Telephone: (650) 752-1700
9 Facsimile: (650) 752-1800

9 *Attorneys for Plaintiff*
10 FINJAN, INC.

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

14
15 FINJAN, INC., a Delaware Corporation,
16
17 Plaintiff,
18
19 v.
20
21 QUALYS, INC., a Delaware Corporation,
22
23 Defendant.

Case No.: 4:18-cv-07229-YGR

**DECLARATION OF AUSTIN MANES IN
SUPPORT OF PLAINTIFF FINJAN,
INC.’S ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL**

1 I, Austin Manes, declare as follows:

2 1. I am an attorney with the law firm of Kramer Levin Naftalis & Frankel LLP, counsel of
 3 record for Plaintiff Finjan, Inc. (“Finjan”). I have personal knowledge of the facts set forth in this
 4 declaration and can testify competently to those facts. I make this declaration in support of Finjan’s
 5 Administrative Motion to File Documents Under Seal pursuant to Civil Local Rules 79-5(d) and 79-5(e).

6 2. I have reviewed the following documents and confirmed that they contain confidential
 7 information that Finjan has designated as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the
 8 stipulated protective order in this litigation.

ECF or Ex. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
	Plaintiff Finjan, Inc.’S Opposition To Defendant Qualys Inc.’s Motion For Leave To Amend Answer And Affirmative Defenses	Page 1, lines 21-22; page 3, lines 8-12; page 7, lines 25-27; page 8, lines 1-9, 11- 21, 24-28; page 9, lines 1-5	This document reflects confidential license information that Finjan has designated as “Highly Confidential – Attorneys’ Eyes Only” under the Protective Order
Ex. 5 to Declaration Of Aaron Frankel In Support Of Plaintiff Finjan, Inc.’s Opposition To Defendant Qualys Inc.’s Motion For Leave To Amend Answer And Affirmative Defenses	Excerpts from the e- mail chain “Finjan Licenses,” showing Finjan’s diligence in informing Qualys of its work in producing the Trend Micro Patent License Agreement	Page 1, July 19, 2019 message at ¶ 2, lines 5-7, ¶ 3, lines 1-3, ¶ 4 line 1; Page 2, July 19, 2019 message at ¶ 1, line 3, ¶ 2, line 1-2, June 4, 2019 message at ¶ 1, line 1, ¶ 2, line 1.	This document reflects confidential license information that Finjan has designated as “Highly Confidential – Attorneys’ Eyes Only” under the Protective Order

23 3. Finjan requests leave to file these documents under seal because they contain or reference
 24 information that Finjan has designated as “Highly Confidential – Attorneys’ Eyes Only.”
 25
 26
 27
 28

1 I declare under the penalty of perjury under the laws of the United States of America that each of
2 the above statements is true and correct. Executed on March 13, 2020, in Menlo Park, CA.

3
4 /s/ Austin Manes
Austin Manes

5 **ATTESTATION**

6 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
7 document has been obtained from any other signatory to this document.

8 /s/ James Hannah
9 James Hannah

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

