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13 *Attorneys for Defendant*
14 QUALYS INC.

15 **IN THE UNITED STATES DISTRICT COURT**
16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
17 **OAKLAND DIVISION**

19 FINJAN, INC., a Delaware Corporation,) CASE NO.: 4:18-cv-07229-YGR
20)
21 Plaintiff,) **DEFENDANT QUALYS INC.’S**
22) **ADMINISTRATIVE MOTION TO**
v.) **FILE DOCUMENTS UNDER SEAL**
23)
24 QUALYS INC., a Delaware Corporation,) **Judge: Hon. Yvonne Gonzalez**
25) **Rogers**
26) **Date: N/A¹**
Defendant.)

27 ¹ Subject to the Court’s March 12, 2020 Order (D.I. 48) suspending in-person appearances.
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1 **I. INTRODUCTION**

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

Identification of Documents to be Sealed	Portion of Document Sought to be Sealed	Entity That Designated the Information As Confidential
Defendant Qualys Inc.’s Reply in Support of its Motion for Leave to Amend Answer and Affirmative Defenses	Reply at page 4, lines 16-17, 24-27; Reply at page 5, lines 1-2, 7; Reply at page 6, lines 4-28; Reply at page 7, lines 1-2, 4-8	Finjan

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13 The above-identified document contains highly confidential information designated by
14 Plaintiff Finjan, Inc. (“Finjan”) as “Highly Confidential – Attorneys’ Eyes Only.” or contains
15 information so designated by Finjan.

16 **II. ARGUMENT**

17 Qualys seeks to seal portions of its Reply in Support of its Motion for Leave to Amend
18 Answer and Affirmative Defenses as it contains information that Finjan has designated as
19 “Highly Confidential –Attorneys’ Eyes Only.” (Mays Decl.² at ¶ 3(a).) This request is narrowly
20 tailored in that it seeks to seal only this one document, regarded as highly confidential pursuant
21 to the Stipulated Protective Order governing the treatment of confidential information exchanged
22 during discovery.

23 **III. CONCLUSION**

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26 ² Declaration of Christopher D. Mays in support of this motion to file concurrently hereto.
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