

1 EDWARD G. POPLAWSKI (SBN 113590)
epoplawski@wsgr.com
2 OLIVIA M. KIM (SBN 228382)
okim@wsgr.com
3 WILSON SONSINI GOODRICH & ROSATI
4 Professional Corporation
633 West Fifth Street, Suite 1550
5 Los Angeles, CA 90071
Telephone: (323) 210-2900
6 Facsimile: (866) 974-7329

7 RYAN R. SMITH (SBN 229323)
rsmith@wsgr.com
8 CHRISTOPHER D. MAYS (SBN 266510)
cmays@wsgr.com
9 WILSON SONSINI GOODRICH & ROSATI
10 Professional Corporation
650 Page Mill Road
11 Palo Alto, CA 94304-1050
12 Telephone: (650) 493-9300
Facsimile: (650) 493-6811

13 *Attorneys for Defendant*
14 QUALYS INC.

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

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

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

1 I, Christopher D. Mays, the undersigned, declare as follows:

2 1. I am an attorney at law, duly licensed to practice before all the courts of the State
3 of California. I am an associate in the law firm of Wilson Sonsini Goodrich Rosati and counsel
4 of record for Defendant Qualys Inc. (“Qualys”). I make this declaration in support of Qualys’s
5 Administrative Motion to File Documents Under Seal on my own personal knowledge.

6 2. I have reviewed the following document and confirmed that it contains
7 information that Plaintiff Finjan, Inc.’s (“Finjan”) has designated as “Highly Confidential –
8 Attorneys’ Eyes Only”:

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 Brief”)	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

15
16 3. As required by Local Rules 79-5, I submit this Declaration in support of Qualys’s
17 Motion to File Documents Under Seal to confirm that the above-identified document, based on
18 current information and belief, contains information that is highly confidential and sealable as
19 follows:

20 a. The Reply Brief (redacted portions at redacted portions at 4:16-17, 4:24-
21 27, 5:1-2, 5:7; 6:4-28, 7:12, and 7:4-8) refers to information that has been designated by Finjan
22 as “Highly Confidential – Attorneys’ Eyes Only” under the Protective Order in this case.

23 4. The requested relief is necessarily and narrowly tailored to protect only the
24 confidentiality of the designated document. Qualys seeks only to seal this one document.

25 I declare under penalty of perjury of the laws of the State of California and the United
26 States that each of the above statements is true and correct. Executed on the 20th Day of March,
27 2020, in Morgan Hill, California.

28 By: /s/ Christopher D. Mays