

1 EDWARD G. POPLAWSKI (SBN 113590)
epoplawski@wsgr.com
2 OLIVIA M. KIM (SBN 228382)
okim@wsgr.com
3 WILSON SONSINI GOODRICH &
4 ROSATI
Professional Corporation
5 633 West Fifth Street, Suite 1550
Los Angeles, CA 90071
6 Telephone: (323) 210-2901
7 Facsimile: (866) 974-7329

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

8 *Attorneys for Defendant*
9 QUALYS INC.

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

13 FINJAN, INC.,
14
15 Plaintiff,
16 v.
17 QUALYS INC.,
18 Defendant.

) CASE NO.: 4:18-cv-07229-YGR
)
) **DECLARATION OF CHRISTOPHER**
) **MAYS IN SUPPORT OF**
) **ADMINISTRATIVE MOTION TO**
) **FILE DOCUMENTS UNDER SEAL**
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1 I, Christopher Mays, declare as follows:

2 1. I am an attorney with the law firm of Wilson, Sonsini, Goodrich, & Rosati
3 (“WSGR”), counsel of record for Defendant Qualys Inc. (“Qualys”). I have personal knowledge
4 of the facts set forth in this declaration and can testify competently to those facts. I make this
5 declaration in support of the parties’ Administrative Motion to File Documents Under Seal
6 pursuant to Civil Local Rules 79-5(d) and 79-5(e).

7 2. I have reviewed the below documents and confirmed that they contain sealable
8 information belonging to Qualys. The reasons justifying sealing these documents are provided
9 below.

10 3. Exhibit 5 to the Joint Discovery Letter is a Qualys internal document containing
11 confidential business information such as business strategy and technical details of Qualys’s
12 technology. It also includes confidential analyses of markets in which Qualys competes. As such,
13 the document contains sensitive competitive information and was internally marked as
14 CONFIDENTIAL by Qualys at creation. It is therefore sealable as containing Qualys’s trade
15 secret information.

16 4. Exhibit 8 to the Joint Discovery Letter is a Qualys internal document containing
17 confidential business and technical information regarding Qualys products. The document was
18 internally marked QUALYS CONFIDENTIAL – NOT FOR REDISTRIBUTION BEYOND
19 INTENDED RECIPIENT. It contains Qualys trade secret information about its technical partners
20 and customer information. Also, the document is a confidential response to a prospective
21 customer’s request for proposal. As such, it contains Qualys confidential trade secret information,
22 such as internal sales strategy for its products. Moreover, as this is a response to a third party’s
23 request for proposal, the document may also implicate that third party’s confidential trade secret
24 information as well. This document is kept under strict confidentiality and is sealable as
25 containing Qualys’s trade secret information.

26 5. The Joint Discovery letter quotes and/or describes portions of the above exhibits.
27 Such quotes and/or descriptions are sealable/redactable for the same reasons discussed above.
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1 I declare under the penalty of perjury under the laws of the United States of
2 America that each of the above statements is true and correct. Executed on September 4, 2020,
3 in Morgan Hill, CA.

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6 /s/ Cristopher D. Mays
Christopher D. Mays

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