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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 of
4 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 pursuant
6 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 1 to Defendant Qualys Inc.’s Motion to Strike Portions of Plaintiff Finjan
11 LLC’s Infringement and Damages Expert Reports is an excerpt of selected portions of Finjan’s
12 Infringement Expert Report (Expert Report of Nenad Medvidovic, Ph.D.) and contains technical
13 analysis of Qualys’s products. As such, the document contains sensitive information and was
14 marked by Finjan as “HIGHLY CONFIDENTIAL – ATTORNEYS EYES’ ONLY.” It is therefore
15 sealable as containing Qualys’s technical information.

16 4. Exhibit 2 to Defendant Qualys Inc.’s Motion to Strike Portions of Plaintiff Finjan
17 LLC’s Infringement and Damages Expert Reports is an excerpt of selected portions of Finjan’s
18 Infringement Expert Report (Opening Expert Report of Eric Cole, Ph.D.) and contains technical
19 analysis of Qualys’s products and reference to Qualys Source Code. As such, the document contains
20 sensitive information and was marked by Finjan as “HIGHLY CONFIDENTIAL – ATTORNEYS
21 EYES’ ONLY – SOURCE CODE.” It is therefore sealable as containing Qualys’s technical
22 information and source code.

23 5. Exhibit 3 to Defendant Qualys Inc.’s Motion to Strike Portions of Plaintiff Finjan
24 LLC’s Infringement and Damages Expert Reports is an excerpt of selected portions of Finjan’s
25 Infringement Expert Report (Expert Report of DeForest McDuff, Ph.D) and contains analysis of
26 Qualys’s non-public financials. As such, the document contains sensitive information and was
27 marked by Finjan as “HIGHLY CONFIDENTIAL.” It is therefore sealable as containing Qualys’s
28 financial information.

