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18 ***Attorneys for Plaintiff***
FINJAN, LLC

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 (OAKLAND DIVISION)

22 FINJAN, LLC, a Delaware Limited Liability
23 Company,
24 Plaintiff,
25 v.
26 QUALYS INC., a Delaware Corporation,
27 Defendant.
28

Case No. 4:18-cv-07229-YGR (TSH)

**DECLARATION OF K. NICOLE
WILLIAMS IN SUPPORT OF FINJAN
LLC’S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL**

DATE: March 2, 2021
TIME: 2:00 PM
JUDGE: Hon. Yvonne Gonzalez Rogers
PLACE: Zoom Teleconference

I, K. Nicole Williams, hereby declare and state as follows:

1. I am licensed to practice in the State of California and am a principal in the law firm of Fish & Richardson P.C., counsel of record for Plaintiff Finjan LLC in the above-captioned matter. I have personal knowledge of all the facts contained herein and, if called as a witness, I could and would testify competently thereto.

2. I submit this declaration in support of Finjan LLC’s Administration Motion to File Under Seal. As required under Civil L.R. 79-5(d)(1)(A), Civil L.R. 79-5(e), and this Court’s Standing Order, the basis for asserting confidentiality and the grounds for filing under seal the documents listed below are as follows:

Identification of Documents to be Sealed	Portion of Document to be Sealed	Designating Party	Reason for Sealing
Plaintiff Finjan LLC’s Opposition to Qualys Inc.’s Motion to Strike Portions of Plaintiff’s Infringement and Damages Expert Reports	Highlighted portions at: page 2, lines 19-22; page 5, lines 15-20; page 7, lines 16-17, 21-22, 24, and 28; page 8, lines 3-7, 19, 22-28; page 9, lines 1-7, 9-12; page 11, lines 20-24, 25; page 12, lines 22-23; page 13, lines 12-13, 25-26; page 14, lines 9-10	Qualys	Reflects information designated by Qualys as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order
Exhibit B to the Declaration of Robert Courtney (“Courtney Declaration”) (Excerpts from the Expert Report of Nenad Medvidovic, Ph.D. dated December 1, 2020)	Entirety	Qualys	Reflects information designated by Qualys as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order
Exhibit D to the	Entirety	Qualys	Designated by Qualys as

1	Deposition Transcript of Dilip Bachwani taken September 18, 2020)			Protective Order
3	Exhibit F to the Courtney Declaration (Excerpts from the Opening Expert Report of Dr. Avi Rubin dated December 1, 2020	Entirety	Qualys	Reflects information designated by Qualys as “HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY” under the Protective Order
7	Exhibit G to the Courtney Declaration (Excerpts from the Opening Expert Report of Eric Cole, Ph.D. Regarding Infringement by Qualys Inc. of Patent Nos. 6,154,844; 8,677,494; and 7,418,731 dated December 1, 2020)	Entirety	Qualys	Reflects information designated by Qualys as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” and “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY – SOURCE CODE” under the Protective Order

3. The highlighted portions of Plaintiff Finjan LLC’s Opposition to Defendant Qualys Inc.’s Motion to Strike Portions of Plaintiff’s Infringement and Damages Expert Reports reflect information Qualys has designated “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order, and from which confidential information regarding Qualys’s accused products could potentially be discerned.

4. Exhibit B to the Declaration of Robert Courtney in support of Finjan’s Opposition to Qualys’s Motion to Strike (“Courtney Declaration”) reflects information Qualys designated “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order, and from which confidential information regarding Qualys’s accused products could potentially be discerned.

5. Exhibit D to the Courtney Declaration is a deposition transcript that Qualys designated “HIGHLY CONFIDENTIAL” under the Protective Order, and from which confidential

1 6. Exhibit F to the Courtney Declaration reflects information Qualys designated
2 “HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY” under the Protective
3 Order, and from which confidential information regarding Qualys’s accused products could
4 potentially be discerned.

5 7. Exhibit G to the Courtney Declaration reflects information Qualys designated
6 “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” and “HIGHLY CONFIDENTIAL
7 – ATTORNEYS’ EYES ONLY – SOURCE CODE” under the Protective Order, and from which
8 confidential information regarding Qualys’s accused products could potentially be discerned
9

10 8. Plaintiff Finjan has carefully balanced the need to protect highly confidential and
11 proprietary information along with information that is reasonable for the public to know. Finjan has
12 demonstrated “good cause” and “compelling reasons” for filing this information under seal.
13

14 I declare under the penalty of perjury of the laws of the United States of America that the
15 foregoing is true and correct.

16 Executed on February 8, 2021, in Encinitas, California.
17

/s/ K. Nicole Williams

K. Nicole Williams
nwilliams@fr.com
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on February 8, 2021, to all counsel of record who are deemed to have consented to electronic service via the Court’s CM/ECF system. Any other counsel of record will be served by electronic mail and regular mail.

/s/ K. Nicole Williams
K. Nicole Williams