

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.

5 2. As required under Civil L.R. 79-5(d)(1)(A), Civil L.R. 79-5(e), and this Court’s
6 Standing Order, the basis for asserting confidentiality and the grounds for filing the documents
7 below under seal are as follows:

8 3. With respect to Finjan’s Opposition to Qualys’s Motion to Strike (D.I. 163-3), the
9 redacted portions of this document describe the technical operations of Qualys’s products which
10 Qualys maintains as highly confidential information. Qualys has marked this information
11 “HIGHLY CONFIDENTIAL – ATTORNEYS EYES’ ONLY.” Specifically, the redactions on the
12 following pages disclose Qualys’s technical information: Pages 2, 5, 7, 8, 9, 11, 12, 13, and 14.
13 These redactions are also discussed in more detail below to the extent they quote or cite material
14 listed below.

15 4. Exhibit B to the Declaration of Robert Courtney is an excerpt of the Expert Report
16 of Nenad Medvidovic, Ph.D., dated December 1, 2020, and contains technical analysis of Qualys’s
17 products, which discusses materials that Qualys has marked “HIGHLY CONFIDENTIAL –
18 ATTORNEYS EYES’ ONLY.” Specifically, the following paragraphs from Exhibit B include
19 highly confidential technical discussions regarding the specifics of how Qualys’s technology works:
20 ¶¶ 21, 22, 99, 100, 102-105, 113-115, 134 (top of page 42, no paragraph number), 135-137, 163,
21 165, 170 (top of page 56, no paragraph number), 188-194, 226 (top of page 88, no paragraph
22 number), 227, 230, 235, 236, 238, 248 (top of page 98, no paragraph number), 259 (top of page 102,
23 no paragraph number), 260, 262, 263, 280-283, 287, 295, and 303. It is therefore sealable as
24 containing Qualys’s technical information.

25 5. Exhibit D to the Declaration of Robert Courtney is an excerpt of the Deposition
26 Transcript of Dilip Bachwani, a Qualys engineer, taken September 18, 2020 and contains technical
27 discussion of Qualys’s products. The redacted portion of Exhibit D contains a discussion of the
28 technical functionality of how Qualys’s Cloud Agent operates. As such, the document contains

1 sensitive information and was marked by Qualys as “HIGHLY CONFIDENTIAL – ATTORNEYS
2 EYES’ ONLY.” It is therefore sealable as containing Qualys’s technical information.

3 6. Exhibit F does not contain any Qualys confidential information and need not be
4 sealed.

5 7. Exhibit G does not contain any Qualys confidential information and need not be
6 sealed.

7 I declare under the penalty of perjury under the laws of the United States of America that each of
8 the above statements is true and correct. Executed on February 12, 2021, in Morgan Hill, CA.
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11 */s/ Christopher D. Mays*
12 Christopher D. Mays

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