	Case 4:18-cv-07229-YGR Doc	ument 165 Fil	ed 02/12/21 Page 1 of 3
1 2 3 4 5 6 7 8	EDWARD G. POPLAWSKI (SBN 1 epoplawski@wsgr.com OLIVIA M. KIM (SBN 228382) okim@wsgr.com WILSON SONSINI GOODRICH & ROSATI Professional Corporation 633 West Fifth Street, Suite 1550 Los Angeles, CA 90071 Telephone: (323) 210-2900 Facsimile: (866) 974-7329 <i>Attorneys for Defendant</i> QUALYS INC.	rsmi CHF cma WIL ROS Prof 650 Palo Tele	AN R. SMITH (SBN 229323) th@wsgr.com RISTOPHER D. MAYS (SBN 266510) ys@wsgr.com SON SONSINI GOODRICH & SATI essional Corporation Page Mill Road Alto, CA 94304-1050 phone: (650) 493-9300 simile: (650) 493-6811
9	QUALYSINC.		
10	IN THE UNITED STATES DISTRICT COURT		
11	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
12	OAKLAND DIVISION		
13			
14	FINJAN, LLC.,)	CASE NO.: 4:18-cv-07229-YGR
15	Plaintiff,		ECLARATION OF CHRISTOPHER 1AYS IN SUPPORT OF FINJAN
16	V.	j L	LC'S ADMINISTRATIVE MOTION O FILE UNDER SEAL
17	QUALYS INC.,) -	
18	Defendant.)	
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1 || I, Christopher Mays, declare as follows:

I am an attorney with the law firm of Wilson, Sonsini, Goodrich, & Rosati
 ("WSGR"), counsel of record for Defendant Qualys Inc. ("Qualys"). I have personal knowledge of
 the facts set forth in this declaration and can testify competently to those facts.

2. 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 the documents
below under seal are as follows:

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

15 4. Exhibit B to the Declaration of Robert Courtney is an excerpt of the Expert Report of Nenad Medvidovic, Ph.D., dated December 1, 2020, and contains technical analysis of Qualys's 16 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.

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

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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.		
9	the above statements is true and correct. Executed on reordary 12, 2021, in Worgan Thin, CA.		
10			
11	/s/ Christopher D. Mays Christopher D. Mays		
12	Christopher D. Mays		
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