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14 **Attorneys for Plaintiff**
 15 **FINJAN, LLC**

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
 18 (OAKLAND DIVISION)

19 FINJAN, LLC, a Delaware Limited Liability
 20 Company,

21 Plaintiff,

22 v.

23 QUALYS INC., a Delaware Corporation,

24 Defendant.

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

**DECLARATION OF JASON W. WOLFF
 IN SUPPORT OF FINJAN, LLC'S
 ADMINISTRATIVE MOTION TO FILE
 UNDER SEAL ITS LETTER TO THE
 HONORABLE YVONNE GONZALEZ
 ROGERS FROM FINJAN LLC
 REGARDING QUALYS INC.'S LETTER
 REQUESTING A PRE-FILING
 CONFERENCE FOR ITS SUMMARY
 JUDGMENT MOTION**

1 I, Jason W. Wolff, hereby declare and state as follows:

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

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

Identification of Documents to be Sealed	Portion of Document to be Sealed	Designating Party	Reason(s) for Sealing
Plaintiff Finjan LLC's Letter to the Honorable Yvonne Gonzales Rogers from Finjan LLC Re Qualys Inc.'s Letter Requesting a Pre-Filing Conference for its Summary Judgment Motions	Highlighted portions at : pg. 1, lines 15-19, 21-22, 27-28; pg. 2, lines 1-3, 8-12, 15-23; pg. 3, lines 1-2	Qualys	This document reflects information that Qualys designated "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" under the Protective Order (ECF 34), and from which confidential information regarding Qualys's accused products could be potentially discerned. <i>See</i> Declaration of Jason W. Wolff ("Wolff Decl.") ¶ 3.

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3. The highlighted portions of Finjan LLC's Letter To The Honorable Yvonne Gonzalez Rogers From Finjan LLC Regarding Qualys Inc.'s Letter Requesting A Pre-Filing Conference For Its Summary Judgment Motion reflect information Qualys has designated "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" under the Protective Order, and from which confidential information regarding Qualys' accused products could be potentially discerned.

4. Plaintiff Finjan has carefully balanced the need to protect highly confidential and proprietary information along with information that is reasonable for the public to know. Finjan has demonstrated "good cause" for filing this information under seal.

1 I declare under the penalty of perjury of the laws of the United States of America that the
2 foregoing is true and correct. Executed on March 22, 2021, in San Diego, California.

3 By: /s/ Jason W. Wolff
4 Jason W. Wolff

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