

1 Juanita R. Brooks (CA SBN 75934)
 2 brooks@fr.com
 3 Roger A. Denning (CA SBN 228998)
 4 denning@fr.com
 5 Jason W. Wolff (CA SBN 215819)
 6 wolff@fr.com
 7 Megan A. Chacon (CA SBN 304912)
 8 chacon@fr.com
 9 K. Nicole Williams (CA SBN 291900)
 10 nwilliams@fr.com
 11 FISH & RICHARDSON P.C.
 12 12860 El Camino Real, Suite 400
 13 San Diego, CA 92130
 14 Phone: (858) 678-5070 /Fax: (858) 678-5099

Philip W. Goter (*pro hac vice*)
 goter@fr.com
 Robert P. Courtney (CA SBN 248392)
 courtney@fr.com
 FISH & RICHARDSON P.C.
 3200 RBC Plaza
 60 South 6th Street
 Minneapolis, MN 55402
 Phone: (612) 335-5070 /Fax: (612) 288-9696

Proshanto Mukherji (*pro hac vice*)
 mukherji@fr.com
 FISH & RICHARDSON P.C.
 One Marina Park Drive
 Boston, MA 02210
 Phone: (617) 542-5070/ Fax (617) 542-8906

15 Aamir A. Kazi (*pro hac vice*)
 16 kazi@fr.com
 17 Lawrence R. Jarvis (*pro hac vice*)
 18 jarvis@fr.com
 19 Fish and Richardson P.C.
 20 1180 Peachtree Street Ne 21st Floor
 21 Atlanta, GA 30309
 22 Phone: (404) 879-7238/ Fax: 404-892-5002

**Attorneys for Plaintiff
 FINJAN LLC**

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 (OAKLAND DIVISION)

23 FINJAN LLC, a Delaware Limited Liability
 24 Company,
 25
 26 Plaintiff,
 27
 28 v.
 29 QUALYS INC., a Delaware Corporation,
 30
 31 Defendant.

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**

1 I, K. Nicole Williams, 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 Plaintiff Finjan LLC in the above-captioned matter.

4 I have personal knowledge of all the facts contained herein and, if called as a witness, I could and
5 would testify competently thereto.

6
7 2. I submit this declaration in support of Finjan LLC's Administration Motion to File
8 Under Seal. As required under Civil L.R. 79-5(d)(1)(A), Civil L.R. 79-5(e), and this Court's
9 Standing Order, the basis for asserting confidentiality and the grounds for filing under seal the
10 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 Renewed Motion to Strike Portions of Plaintiff's Infringement Expert Reports	Highlighted portions at: Page 4, lines 17-18; Page 6, lines 1-9 and 26-28; Page 7, lines 1-4; and Page 8, lines 6-8.	Qualys	Reflects information designated by Qualys as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" under the Protective Order
Exhibit A to the Declaration of Lawrence R. Jarvis ("Jarvis Declaration") (Excerpts from the Rebuttal Expert Report of Dr. Avi Rubin Regarding U.S. Patent No. 8,225,408 dated January 12, 2020)	Entirety	Qualys	Designated by Qualys as "HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS' EYES ONLY" under the Protective Order
Exhibit C to the Jarvis 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

1 Declaration (Excerpts 2 from Vulnerability 3 Spreadsheet 4 QUALYS- RUBIN0911)		designated by Qualys as “HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY” under the Protective Order
---	--	--

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

10
11 4. Exhibit A to the Declaration of Lawrence R. Jarvis in support of Finjan’s Opposition
12 to Qualys Inc.’s Renewed Motion to Strike (“Jarvis Declaration”) was designated by Qualys as
13 “HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY” under the Protective
14 Order, and from which confidential information regarding Qualys’s accused products could
15 potentially be discerned.

16
17 5. Exhibit C to the Jarvis Declaration reflects information designated by Qualys as
18 “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order, and
19 from which confidential information regarding Qualys’s accused products could potentially be
20 discerned.

21
22 6. Exhibit E to the Jarvis Declaration reflects information designated by Qualys as
23 “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order, and
24 from which confidential information regarding Qualys’s accused products could potentially be
25 discerned.

26
27 7. Plaintiff Finjan has carefully balanced the need to protect highly confidential and
28 proprietary information along with information that is reasonable for the public to know. Finjan has
demonstrated “good cause” and “compelling reasons” 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.

3 Executed on May 18, 2021, in San Diego, California.
4

5 /s/ K. Nicole Williams

6 K. Nicole Williams

7 nwilliams@fr.com
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28