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10 *Attorneys for Defendant*
 11 QUALYS INC.

12 **IN THE UNITED STATES DISTRICT COURT**
 13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 14 **OAKLAND DIVISION**

16	FINJAN LLC,)	CASE NO.: 4:18-cv-07229-YGR
)	
17	Plaintiff,)	QUALYS INC.'S RESPONSE TO
)	FINJAN LLC'S ADMINISTRATIVE
18	v.)	MOTION TO FILE UNDER SEAL
)	
19	QUALYS INC.,)	
)	
20	Defendant.)	
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1 Plaintiff Finjan LLC's ("Finjan") Administrative Motion to File Under Seal (D.I. 197) seeks
2 to seal highlighted portions of its Opposition to Qualys Inc.'s Renewed Motion to Strike Portions
3 of Plaintiff's Infringement Expert Reports ("Finjan's Opposition") as detailed in the Declaration of
4 K. Nicole Williams (D.I. 197); the entirety of Exhibit A to the Declaration of Lawrence R. Jarvis
5 ("Jarvis Declaration") (Excerpts from the Rebuttal Expert Report of Dr. Avi Rubin Regarding U.S.
6 Patent No. 8,225,408 dated January 12, 2020); the entirety of Exhibit C to the Jarvis Declaration
7 (Excerpts from the Expert Report of Nenad Medvidovic, Ph.D. dated December 1, 2020); and the
8 entirety of Exhibit E to the Jarvis Declaration (Excerpts from Vulnerability Spreadsheet QUALYS-
9 RUBIN0911).

10 Qualys does not maintain a claim of confidentiality over the highlighted portions of Finjan's
11 Opposition or over Exhibits A, C, and E to the Jarvis Declaration. More specifically, Qualys does
12 not maintain confidentiality claims over the highlighted portions of Finjan's Opposition at 4:17-18;
13 6:1-9; 6:26-28; 7:1-4; and 8:6-8. 1. However, Qualys does maintain confidentiality claims over the
14 underlying documents that the highlighted portions were quoted from and the underlying documents
15 that Exhibits A, C, and E were excerpted from.

16 Because Qualys does not maintain a claim of confidentiality over the highlighted portions
17 of Finjan's Opposition or Exhibits A, C, and E, Finjan's Administrative Motion to File Under Seal
18 should be denied.

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20
21 Respectfully submitted,

22 WILSON SONSINI GOODRICH & ROSATI

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24 Dated: May 24, 2021

By: /s/ Christopher D. Mays
Christopher D. Mays

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26 *Counsel for*
QUALYS INC.

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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 May 24, 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/ Christopher D. Mays
Christopher D. Mays