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 16 **FINJAN LLC**

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

20 FINJAN LLC, a Delaware Limited Liability
 Company,
 21 Plaintiff,
 22 v.
 23 QUALYS INC., a Delaware Corporation,
 24 Defendant.
 25

Case No. 4:18-cv-07229-YGR (TSH)
 Hon. Yvonne Gonzalez Rogers

**FINJAN LLC’S ADMINISTRATIVE
 MOTION TO FILE UNDER SEAL ITS
 REPLY IN SUPPORT OF MOTION FOR
 SUMMARY JUDGMENT AND
 OPPOSITION TO QUALYS INC.’S
 CROSS-MOTION FOR SUMMARY
 JUDGMENT AND EXHIBITS**

1 **I. INTRODUCTION**

2 Plaintiff Finjan LLC (“Finjan”), having reviewed and complied with Civil Local Rule 79-5,
3 hereby moves the Court for permission to file under seal the following documents:

Identification of Documents to be Sealed	Portion(s) to Seal	Designating Party	Reason(s) for Sealing
Finjan LLC’s Reply in Support of Motion for Summary Judgment and Opposition to Qualys’s Cross-Motion for Summary Judgment	Highlighted Portions at: Page 6, lines 6–8; Page 9, lines 8, 10–18, 20–23, 25–27; Page 10, line 21; Page 12, lines 27–28; Page 13, lines 1–2, 10, 12-13; Page 14, lines 3–5, 8–17, 21–24; Page 15, lines 5, 8–10; Page 18, line 28; Page 19, lines 1, 8, 11–13, 20, 23–26; Page 20, lines 1–2, 5–9, 12–14	Qualys	This document reflects information Qualys has designated “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order and from which confidential information regarding Qualys’s accused products could potentially be discerned.
Finjan LLC’s Responsive Separate Statement of Undisputed Material Facts	Highlighted portions at: Page 2, line 15; Page 4, lines 4–5; Page 7, line 28; Page 8, lines 1, 3–4, 5–6, 8–9, 10; Page 9, lines 2–6, 11-16, 18–25; Page 10, lines 1–7, 9–12; Page 11, line 16; Page 12, lines 8, 14–16, 18–20; Page 13, lines 4–7	Qualys	This document reflects information Qualys has designated “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order and from which confidential information regarding Qualys’s accused products could potentially be discerned.
Ex. 8 to the Wolff	Pages 51–53, 67–	Qualys	This document reflects

1	Declaration (Excerpts from the 2 Expert Report of 3 Nenad Medvidović, 4 Ph.D. dated 5 December 1, 2020)	69, 79–81, 84, 99–100, 102, 104, 107–108, 111–121, 123, 129–133, 137, 139–140, and 156		information Qualys has designated “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order and from which confidential information regarding Qualys’s accused products could potentially be discerned.
7	Ex. 14 to the Wolff Declaration (Excerpts from the deposition transcript of Aviel Rubin, Ph.D. taken March 4, 2021)	Entirety	Qualys	Qualys designated this transcript “HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY” under the Protective Order. Confidential information regarding Qualys’s accused products could potentially be discerned from this document.
14	Ex. 15 to the Wolff Declaration (Excerpts from the Rebuttal Expert Report of Dr. Avi Rubin Regarding U.S. Patent No. 8,225,408 dated January 21, 2020)	Entirety	Qualys	Qualys designated this document “HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY” under the Protective Order. Confidential information regarding Qualys’s accused products could potentially be discerned from this document.
20	Ex. 16 to the Wolff Declaration (QUALYS00257792- QUALYS00257795)	Entirety	Qualys	Qualys designated this document “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order. Confidential information regarding Qualys’s accused products could potentially be discerned from this document.
26	Ex. 17 to the Wolff Declaration (QUALYS01235879-	Entirety	Qualys	Qualys designated this document “HIGHLY CONFIDENTIAL –

1				ONLY” under the Protective Order. Confidential information regarding Qualys’s accused products could potentially be discerned from this document.
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5	Ex. 19 to the Wolff Declaration (Excerpts from the deposition transcript of Holger Kruse taken September 14, 2020)	Pages 7–8	Qualys	Qualys designated this transcript “HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY” under the Protective Order. Confidential information regarding Qualys’s accused products could potentially be discerned from this document.
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11	Ex. 20 to the Wolff Declaration (QUALYS02019776-QUALYS02019800)	Entirety	Qualys	Qualys designated this document “HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY” under the Protective Order. Confidential information regarding Qualys’s accused products could potentially be discerned from this document.
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18	Ex. 21 to the Wolff Declaration (Excerpts from the Stuart Stubblebine’s Rebuttal Expert Report Regarding Non-Infringement and Apportionment Issues (U.S. Patent Nos. 8,677,494; 6,154,844 and 7,418,731 dated January 12, 2021)	Entirety	Qualys	Qualys designated this document “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order. Confidential information regarding Qualys’s accused products could potentially be discerned from this document.
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25	Ex. 22 to the Wolff Declaration (Excerpts from the deposition transcript of Stuart	Entirety	Qualys	Qualys designated this transcript “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY SOURCE CODE”
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1	taken March 5, 2021)			Confidential information regarding Qualys's accused products could potentially be discerned from this document.
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4	Ex. 24 to the Wolff Declaration (Excerpts from the Opening Expert Report of Eric Cole, Ph.D. Regarding Infringement by Qualys Inc. of Patent Nos. 6,154,844; 8,677,494 and 7,418,731 dated December 1, 2020)	Pages 129–132, 150–152, 678–680, and 690–703	Qualys	This document reflects information Qualys has designated “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY – SOURCE CODE” under the Protective Order and from which confidential information regarding Qualys’s accused products could potentially be discerned.
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11	Ex. 25 to the Wolff Declaration (Excerpts from the deposition transcript of Eric Cole, Ph.D. taken March 2, 2021)	Pages 90–96, 133–135	Qualys	This transcript reflects information Qualys has designated “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order and from which confidential information regarding Qualys’s accused products could potentially be discerned.
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19 Filed concurrently herewith and pursuant to Civ. L.R. 79-5(c) are the confidential versions

20 of Plaintiff Finjan Inc.’s Reply in Support of Motion for Summary Judgment and Opposition to

21 Qualys’s Cross-Motion for Summary Judgment, Finjan LLC’s Responsive Separate Statement of

22 Undisputed Material Facts, and Exhibits 8, 14–17, 19–22, and 24–25 to the Declaration of Jason W.

23 Wolff in Support thereof, as well as a public redacted version of the Reply and Opposition, Separate

24 Statement, and Exhibits.

25 **II. ARGUMENT**

26 **A. Legal Standard**

27 Under Fed. Rule Civ. P. 26(c)(1)(G), the Court may, in its discretion and for good cause,

issue an order “requiring that a trade secret or other confidential research, development, or

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