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 FINJAN LLC**

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

20 FINJAN LLC, a Delaware Limited Liability
 21 Company,

22 Plaintiff,

23 v.

24 QUALYS INC., a Delaware Corporation,

25 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 ITS REPLY IN
 SUPPORT OF MOTION FOR SUMMARY
 JUDGMENT AND OPPOSITION TO
 QUALYS INC.'S CROSS-MOTION FOR
 SUMMARY JUDGMENT AND EXHIBITS**

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 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(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;	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.

1		14–16, 18–20; Page 13, lines 4– 7		
2	Ex. 8 to the Wolff Declaration (Excerpts from the Expert Report of Nenad Medvidović, Ph.D. dated December 1, 2020)	Pages 51–53, 67– 69, 79–81, 84, 99–100, 102, 104, 107–108, 111–121, 123, 129–133, 137, 139–140, and 156	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.
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8	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.
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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.
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19	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.
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25	Ex. 17 to the Wolff Declaration (QUALYS01235879- QUALYS01235940)	Entirety	Qualys	Qualys designated this document “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order. Confidential information
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1				products could potentially be discerned from this document.
2	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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8	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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13	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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20	Ex. 22 to the Wolff Declaration (Excerpts from the deposition transcript of Stuart Stubblebine, Ph.D. taken March 5, 2021)	Entirety	Qualys	Qualys designated this transcript “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY SOURCE CODE” under the Protective Order. Confidential information regarding Qualys’s accused products could potentially be discerned from this document.
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25	Ex. 24 to the Wolff Declaration (Excerpts from the Opening Expert Report of Eric Cole, Ph.D. Regarding	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”
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1 2 3 4 5 6 7 8 9	Qualys Inc. of Patent Nos. 6,154,844; 8,677,494 and 7,418,731 dated December 1, 2020)		and from which confidential information regarding Qualys's accused products could potentially be discerned.
	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.

10 3. The highlighted portions of Finjan LLC’s Reply in Support of Motion for Summary
11 Judgment and Opposition to Qualys’s Cross-Motion for Summary Judgment reflect information
12 Qualys has designated “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the
13 Protective Order, and from which confidential information regarding Qualys’s accused products
14 could potentially be discerned.

15 4. The highlighted portions of Finjan LLC’s Responsive Separate Statement of
16 Undisputed Material Facts reflect information Qualys has designated “HIGHLY CONFIDENTIAL
17 – ATTORNEYS’ EYES ONLY” under the Protective Order, and from which confidential
18 information regarding Qualys’s accused products could potentially be discerned.

19 5. Exhibit 8 to the Declaration of Jason W. Wolff in Support of Finjan LLC’s Reply in
20 Support of Motion for Summary Judgment and Opposition to Qualys’s Cross-Motion for Summary
21 Judgment (“Wolff Declaration”) reflects information Qualys has designated “HIGHLY
22 CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order, and from which
23 confidential information regarding Qualys’s accused products could potentially be discerned.
24 Qualys previously filed publicly certain excerpts from the Expert Report of Nenad Medvidović,
25 Ph.D. dated December 1, 2020, including pages 1, 27–30, 66, 85–91, 103, 109–110, 122, 124–126,
26 138, and 157. Dkt. No. 195-9. Therefore, Finjan does not request that these portions of Exhibit 8
27 be sealed. Finjan requests only the following pages of Exhibit 8 be sealed: 51–53, 67–69, 79–81,

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