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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FINJAN, INC., a Delaware Corporation,

Plaintiff,

vs.

SONICWALL INC., a Delaware Corporation

Defendant.

Case No. 5:17-cv-04467-BLF-VKD

DECLARATION OF JENNIFER H. FORTE IN SUPPORT OF SONICWALL, INC.'S ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL

1 I, Jennifer H. Forte, declare as follows:

2 1. I am an associate at the law firm of Duane Morris LLP and am counsel for Defendant
3 SonicWall Inc. (“SonicWall”). I have personal knowledge of the matters set forth in this
4 Declaration, and if called as a witness, could and would testify competently to such facts under oath.
5 I submit this Declaration in Support of SonicWall’s Administrative Motion to File Documents Under
6 Seal, pursuant to Civil Local Rule 79-5(d)-(e). In making this Declaration, it is not my intention,
7 nor the intention of SonicWall, to waive the attorney-client privilege, the attorney work-product
8 immunity, or any other applicable privilege.
9

10 2. I have reviewed the following documents and confirmed that they consist of or quote
11 directly from documents or testimony designated “CONFIDENTIAL – ATTORNEYS’ EYES
12 ONLY” pursuant to the Stipulated Protective Order in this litigation.
13

ECF or Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
	Joint Discovery Letter	Highlighted portions on pg. 2 and pg. 3	This document reflects information, including the terms of an agreement and deposition testimony that Finjan has designated as “Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order.
Ex. A	Finjan, Inc.’s Supplemental Privilege and Redaction Log	Entirety	This document reflects information that Finjan has designated as “Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order.

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26 3. Good cause exists to seal the portions of the documents identified in the chart above
27 for the reasons stated therein. SonicWall seeks to seal only those portions of the documents that
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1 contain “sealable,” as defined in Civil Local Rule 79-5(d), and for which it has good cause to seal.

2 4. This information has been designated by Finjan as Confidential – Attorneys’ Eyes
3 Only pursuant to the Protective Order. Accordingly, I am informed and believe that, this confidential
4 information relates to Finjan’s business and, if disclosed publicly, could result in harm to Finjan.

5 I declare under penalty of perjury under the laws of California and the United States that the
6 foregoing is true and correct. Executed on April 17, 2020, in Atlanta, Georgia.
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9 /s/ Jennifer H. Forte
Jennifer H. Forte

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