

1 PAUL ANDRE (State Bar No. 196585)
pandre@kramerlevin.com
2 LISA KOBIALKA (State Bar No. 191404)
lkobialka@kramerlevin.com
3 JAMES HANNAH (State Bar No. 237978)
jhannah@kramerlevin.com
4 KRISTOPHER KASTENS (State Bar No. 254797)
kkastens@kramerlevin.com
5 HANNAH LEE (State Bar No. 253197)
hlee@kramerlevin.com
6 KRAMER LEVIN NAFTALIS
7 & FRANKEL LLP
8 990 Marsh Road
Menlo Park, CA 94025
9 Telephone: (650) 752-1700
Facsimile: (650) 752-1800
10
11 *Attorneys for Plaintiff*
FINJAN, INC.

12
13 **IN THE UNITED STATES DISTRICT COURT**
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN JOSE DIVISION**

16
17 FINJAN, INC.,
18 Plaintiff,
19 v.
20 SONICWALL, INC.,
21 Defendant.

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

**[PROPOSED] ORDER GRANTING
PLAINTIFF FINJAN, INC.'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

[RE: PLAINTIFF FINJAN, INC.'S
DECLARATION OF AARON FRANKEL IN
SUPPORT OF SUBMISSION OF
DOCUMENTS FOR *IN CAMERA* REVIEW
RELATING TO APRIL 17, 2020 JOINT
DISCOVERY LETTER BRIEF]

1 Plaintiff Finjan, Inc.'s ("Finjan") Administrative Motion to File Documents Under Seal was
 2 brought before this Court. Upon consideration of this motion and the supporting declaration of Aaron
 3 Frankel filed in support of the motion, the Court finds there to be good cause for granting the request to
 4 file certain documents under seal.

5 Good cause having been shown, the Court finds that:

6 There exists overriding confidentiality interests that overcome the right of public access to the
 7 record of the following documents:

Identification of Documents or Portions of Document to be Sealed	Portions of Document to be Sealed	Designating Party	Reasons for Sealing
Exhibit 1 to the Declaration of Aaron Frankel in Support of Submission of Documents for <i>In Camera</i> Review Relating to April 17, 2020 Joint Discovery Letter Brief ("Declaration") (Finjan's Consolidated Privilege and Redaction Log for <i>In Camera</i> Review)	Entirety	Finjan	This document contains Finjan's highly confidential information relating to privileged and work product protected discussions with its counsel.
Exhibit 2 to the Declaration (Finjan's Investors' Rights Agreement)	Entirety	Finjan	This document contains Finjan's highly confidential business information relating to its relationship with its investors, from before Finjan was a public company.
Exhibit 3 to the Declaration (Deposition of Daniel Chinn)	Entirety	Finjan	This document contains Finjan's highly confidential business information relating to its Board operations and licensing efforts.

Identification of Documents or Portions of Document to be Sealed	Portions of Document to be Sealed	Designating Party	Reasons for Sealing
Exhibit 4 to the Declaration (Deposition of Yoav Samet)	Entirety	Finjan; Cisco Systems, Inc.	This document contains highly confidential information relating to the business relationship between Cisco Systems, Inc. and Finjan, and confidential internal Cisco correspondence. The deponent is a former employee of Cisco Systems, Inc.

A substantial probability exists that the overriding confidentiality interests will be prejudiced if the record is not sealed;

The proposed sealing is narrowly tailored; and

No less restrictive means exist to achieve these overriding interests.

IT IS THEREFORE ORDERED that Finjan's Administrative Motion to File Documents Under Seal is GRANTED with respect to the document set forth above.

IT IS SO ORDERED.

DATED: _____

Honorable Virginia K. DeMarchi
United States Magistrate Judge