	Case 5:17-cv-04467-BLF Document 299	Filed 10/14/20 Page 1 of 16	
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11	Attorneys for Defendant SONICWALL INC.		
	12 UNITED STATES DISTRICT COURT		
13	NORTHERN DISTRIC	T OF CALIFORNIA	
14	SAN JOSE DIVISION		
15 16	FINJAN, LLC, a Delaware Corporation,	Case No. 5:17-cv-04467-BLF-VKD DEFENDANT SONICWALL INC.'S ADMINISTRATIVE MOTION TO	
10	Plaintiff,		
18	VS.	FILE DOCUMENTS UNDER SEAL	
19	SONICWALL INC., a Delaware Corporation		
20	Defendant.		
21			
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#### I. INTRODUCTION

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Pursuant to Civil L.R. 7-11 and 79-5, this Court's Standing Civil Order Re: Civil Cases, the Parties Stipulated Protective Order (Dkt. 68), the Parties Stipulated Order Regarding Discovery of Electronically Stored Information (Dkt. 69), and Federal Rule of Civil Procedure 26(b)(5)(B), Defendant SonicWall Inc. ("SonicWall") hereby moves the Court for leave to file under seal, pursuant to Civil L.R. 79-5(d)-(e), the items identified in the table below.

7	Exhi	bit No.	Document Title	Portion(s) to Seal	Reason(s) for Sealing
8 9			Defendant SonicWall Inc.'s Motion to Strike	Highlighted portions at:	The highlighted portions of this document reflect
9 10			New Theories in Finjan's Expert Reports	Page 2, lines 3-9, 11-12, 14-15;	information that SonicWall has
11				Page 3, lines 16-18, 20-24, 26;	designated as "Highly Confidential –
12				Page 4, lines 11, 18-20;	Attorneys' Eyes Only" or "Highly Confidential
13				Page 5, lines 13-14, 20-24;	<ul> <li>Attorney's Eyes Only</li> <li>Source Code" pursuant</li> </ul>
14				Page 6, lines 20-26; Page 10, lines 21-23	to the Stipulated Protective Order. If filed
15				_	publicly, this confidential information could be used to
16					SonicWall's disadvantage by
17					competitors as it concerns the
18					identification, organization, and or
19					operation of SonicWall's proprietary products.
20					<i>See</i> Declaration of Nicole E. Grigg in
21					Support of Administrative Motion
22					to File Documents Under Seal ("Grigg
23					Declaration"), ¶¶ 2-5.
24	Ex. A		Excerpts from Finjan's Third Supplemental	Entirety	This document reflects information that
25			Infringement Contentions – Appendix		SonicWall has designated as "Highly
26			G-2		Confidential – Attorneys' Eyes Only"
27					and "Highly Confidential –
28					Attorneys' Eyes Only -

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	Case 5:17-cv-04467-BLF Document 299 Filed 10/14/20 Page 3 of 16			
1				Source Code" pursuant to the Stipulated
2				Protective Order. If filed publicly, this
3 4				confidential information could be used to SonicWall's
5				disadvantage by competitors as it
6				concerns the identification,
7				organization, and or operation of SonicWall's proprietary products,
8				including its source code. See Grigg
9				Declaration, ¶¶ 2-5.
10	Ex. B	Excerpts from Finjan's Third Supplemental	Entirety	This document reflects information that
11		Infringement Contentions – Appendix		SonicWall has designated as "Highly
12 13		G-3		Confidential – Attorneys' Eyes Only" and "Highly
14				Confidential – Attorneys' Eyes Only -
15				Source Code" pursuant to the Stipulated
16				Protective Order. If filed publicly, this
17				confidential information could be used to
18				SonicWall's disadvantage by
19				competitors as it concerns the
20				identification, organization, and or
21				operation of SonicWall's proprietary products,
22				including its source code. See Grigg
23	Er. C	Encounte from Einion?	Fatianta	Declaration, ¶¶ 2-5.
24	Ex. C	Excerpts from Finjan's Third Supplemental	Entirety	This document reflects information that SonicWall has
25		Infringement Contentions – Appendix G-4		designated as "Highly Confidential –
26				Attorneys' Eyes Only"
27				and "Highly Confidential – Attorneys' Eyes Only -
28				Attorneys' Eyes Only - Source Code" pursuant

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	Case 5:17-cv-04467-BLF Document 299 Filed 10/14/20 Page 4 of 16			
1 2 3 4 5 6 7 8				to the Stipulated Protective Order. If filed publicly, this confidential information could be used to SonicWall's disadvantage by competitors as it concerns the identification, organization, and or operation of SonicWall's proprietary products, including its source code. <i>See</i> Grigg
9 10	Ex. D	10-2-2020 Email from J. Wolff to R. McGrath	Entirety	Declaration, ¶¶ 2-5. The highlighted portions of this document reflect
11 12 13				information that SonicWall has designated as "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stimulated Protective
14 15 16				Stipulated Protective Order. If filed publicly, this confidential information could be used to SonicWall's disadvantage by
17 18				competitors as it concerns the identification, organization, and or
19 20				operation of SonicWall's proprietary products. <i>See</i> Grigg Declaration, ¶¶ 2-5.
21	Ex. E	Excerpts from the EXPERT REPORT OF	Entirety	This document reflects information that
22 23		DR. NENAD MEDVIDOVIĆ REGARDING		SonicWall has designated as "Highly Confidential –
23 24		INFRINGEMENT BY SONICWALL, INC. OF PATENT NOS.		Attorneys' Eyes Only" and "Highly
25		8,225,408; 7,975,305; AND 8,141,154		Confidential – Attorneys' Eyes Only - Source Code" pursuant
26				to the Stipulated Protective Order. If filed
27 28				publicly, this confidential information could be used to
28				could be used to

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1 2 3 4 5 6				SonicWall's disadvantage by competitors as it concerns the identification, organization, and or operation of SonicWall's proprietary products, including its source code. <i>See</i> Grigg Declaration, ¶ 2-5.
7 8 9 10	Ex. F	Excerpts from Finjan's Third Supplemental Infringement Contentions – Appendix E-2	Entirety	This document reflects information that SonicWall has designated as "Highly Confidential – Attorneys' Eyes Only" and "Highly Confidential –
11 12 13				Attorneys' Eyes Only - Source Code" pursuant to the Stipulated Protective Order. If filed publicly, this
13				confidential information could be used to
15				SonicWall's disadvantage by
16				competitors as it concerns the identification,
17				organization, and or operation of SonicWall's
18 19				proprietary products, including its source code. <i>See</i> Grigg Declaration, ¶¶ 2-5.
20	Ex. G	Exacenta from Einion'a	Entiroty	This document reflects
21	EX. G	Excerpts from Finjan's Third Supplemental Infringement	Entirety	information that SonicWall has
22 23		Contentions – Appendix D-1		designated as "Highly Confidential – Attorneys' Eyes Only"
24				and "Highly Confidential –
25				Attorneys' Eyes Only - Source Code" pursuant
26				to the Stipulated Protective Order. If filed
27				publicly, this confidential information could be used to
28				SonicWall's
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