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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FINJAN, LLC, a Delaware Corporation,

Plaintiff,

vs.

SONICWALL INC., a Delaware Corporation

Defendant.

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

**DEFENDANT SONICWALL INC.'S
ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL**

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1 **I. INTRODUCTION**

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

Exhibit No.	Document Title	Portion(s) to Seal	Reason(s) for Sealing
	Defendant SonicWall Inc.’s Motion to Strike New Theories in Finjan’s Expert Reports	Highlighted portions at: Page 2, lines 3-9, 11-12, 14-15; Page 3, lines 16-18, 20-24, 26; Page 4, lines 11, 18-20; Page 5, lines 13-14, 20-24; Page 6, lines 20-26; Page 10, lines 21-23	The highlighted portions of this document reflect information that SonicWall has designated as “Highly Confidential – Attorneys’ Eyes Only” or “Highly Confidential – Attorney’s Eyes Only – Source Code” pursuant 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. See Declaration of Nicole E. Grigg in Support of Administrative Motion to File Documents Under Seal (“Grigg Declaration”), ¶¶ 2-5.
Ex. A	Excerpts from Finjan’s Third Supplemental Infringement Contentions – Appendix G-2	Entirety	This document reflects information that SonicWall has designated as “Highly Confidential – Attorneys’ Eyes Only” and “Highly Confidential – Attorneys’ Eyes Only -

1			Source Code” pursuant 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 Declaration, ¶¶ 2-5.
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10	Ex. B	Excerpts from Finjan’s Third Supplemental Infringement Contentions – Appendix G-3	Entirety
11			This document reflects information that SonicWall has designated as “Highly Confidential – Attorneys’ Eyes Only” and “Highly Confidential – Attorneys’ Eyes Only - Source Code” pursuant 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 Declaration, ¶¶ 2-5.
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24	Ex. C	Excerpts from Finjan’s Third Supplemental Infringement Contentions – Appendix G-4	Entirety
25			This document reflects information that SonicWall has designated as “Highly Confidential – Attorneys’ Eyes Only” and “Highly Confidential – Attorneys’ Eyes Only - Source Code” pursuant
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1			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 Declaration, ¶¶ 2-5.
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10	Ex. D	10-2-2020 Email from J. Wolff to R. McGrath	Entirety
11			The highlighted portions of this document reflect information that SonicWall has designated as "Highly Confidential – Attorneys' Eyes Only" pursuant 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. <i>See</i> Grigg Declaration, ¶¶ 2-5.
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21	Ex. E	Excerpts from the EXPERT REPORT OF DR. NENAD MEDVIDOVIĆ REGARDING INFRINGEMENT BY SONICWALL, INC. OF PATENT NOS. 8,225,408; 7,975,305; AND 8,141,154	Entirety
22			This document reflects information that SonicWall has designated as "Highly Confidential – Attorneys' Eyes Only" and "Highly Confidential – Attorneys' Eyes Only - Source Code" pursuant to the Stipulated Protective Order. If filed publicly, this confidential information could be used to
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1			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.
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7	Ex. F	Excerpts from Finjan's Third Supplemental Infringement Contentions – Appendix E-2	Entirety
8			This document reflects information that SonicWall has designated as “Highly Confidential – Attorneys’ Eyes Only” and “Highly Confidential – Attorneys’ Eyes Only - Source Code” pursuant 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 Declaration, ¶¶ 2-5.
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21	Ex. G	Excerpts from Finjan's Third Supplemental Infringement Contentions – Appendix D-1	Entirety
22			This document reflects information that SonicWall has designated as “Highly Confidential – Attorneys’ Eyes Only” and “Highly Confidential – Attorneys’ Eyes Only - Source Code” pursuant to the Stipulated Protective Order. If filed publicly, this confidential information could be used to SonicWall's
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