| 1 2 3 4 5 | Juanita R. Brooks (CA SBN 75934) brooks@fr.com Roger A. Denning (CA SBN 228998) denning@fr.com Jason W. Wolff (CA SBN 215819) wolff@fr.com John-Paul Fryckman (CA SBN 317591) fryckman@fr.com K. Nicole Williams (CA291900) nwilliams@fr.com FISH & RICHARDSON P.C. 12860 El Camino Real, Suite 400 San Diego, CA 92130 Telephone: (858) 678-5070 / Fax: (858) 678-5099 | | | |
|-----------------------|---|----------------------------------|--|--|
| 6 | Proshanto Mukherji (<i>Pro Hac Vice</i>) mukherji@fr FISH & RICHARDSON P.C. | .com | | |
| 7 8 | One Marina Park Drive Boston, MA 02210 | | | |
| 9 | Phone: (617) 542-5070/ Fax: (617) 542-5906 | | | |
| 10 | Robert Courtney (CA SNB 248392) courtney@fr.com FISH & RICHARDSON P.C. 3200 RBC Plaza | | | |
| 11 | 60 South Sixth Street Minneapolis, MN 55402 Phone: (612) 335-5070 / Fax: (612) 288-9696 | | | |
| 12 | | | | |
| 13 | Additional counsel listed on signature page | | | |
| 14 | Attorneys for Plaintiff FINJAN LLC | | | |
| 15 | UNITED STATES | DISTRICT COURT | | |
| 16 | NORTHERN DISTRICT OF CALIFORNIA | | | |
| 17 | (SAN JOSE | DIVISION) | | |
| 18 | · · | , | | |
| 19 | | Case No. 5:17-cv-04467-BLF (VKD) | | |
| 20 | Company, | FINJAN LLC'S ADMINISTRATIVE | | |
| 21 | Plaintiff, | MOTION TO FILE UNDER SEAL | | |
| 22 | v. | | | |
| 23 | SONICWALL INC., a Delaware Corporation, | | | |
| 24 | Defendant. | | | |
| 25 | | | | |
| 26 | | | | |
| 27 | | | | |
| 28 | | | | |



I. INTRODUCTION

Plaintiff Finjan LLC ("Finjan"), having reviewed and complied with Civil Local Rule 79-

5, hereby moves the Court for permission to file under seal the following documents:

3

1

| 5 | ECF or | Document | Portion(s) to Seal | Reason(s) for Sealing |
|----|----------|---|--------------------------------|--|
| | Exh. No. | | | |
| 6 | D313 | Finjan's Opposition to | Highlighted portions | The highlighted portions of |
| 7 | | SonicWall's Motion to | at: | this document reflect |
| ´ | | Strike Finjan's Expert | page 2, lines 12, 20- | information that SonicWall |
| 8 | | Reports | 25; | has designated as "Highly |
| 9 | | | page 3, lines 1-7, 11- | Confidential – Attorneys' |
| 9 | | | 13; page 4, lines 14-21, | Eyes Only" or "Highly Confidential – Attorneys' |
| 10 | | | 23-26; | Eyes Only – Source Code" |
| 11 | | | page 5, lines 6-12, 14; | pursuant to the Stipulated |
| 11 | | | page 6, lines 3-10; | Protective Order, and from |
| 12 | | | page 7, lines 1-2, 5, | which confidential |
| | | | 16-17; | information regarding |
| 13 | | | page 8, lines 6-7, 13- | SonicWall's accused |
| 14 | | | 17, 21-22; | products could be |
| 17 | | | page 9, lines 8, 10-18, | potentially discerned. |
| 15 | | | 20-21, 26-27; | |
| 16 | | | page 10, lines 1-3, 7-8, 17-20 | |
| 16 | Exh. B | Excerpts from | Entirety | This document reflects |
| 17 | Exil. B | Appendix G-2 to | Littlety | information SonicWall has |
| . | | Finjan's Third | | designated "Highly |
| 18 | | Supplemental | | Confidential – Attorneys' |
| 19 | | Disclosure of Asserted | | Eyes Only" and "Highly |
| | | Claims and | | Confidential – Attorneys' |
| 20 | | Infringement | | Eyes Only – Source Code" |
| 21 | | Contentions and | | pursuant to the Stipulated |
| 21 | | Document Production | | Protective Order, and from |
| 22 | | Pursuant to Patent L.R. | | which confidential |
| | | 3-1 and 3-2, dated December 11, 2019 | | information regarding SonicWall's accused |
| 23 | | ("Third Supplemental | | products could be |
| 24 | | Infringement | | potentially discerned. |
| | | Contentions") | | r |
| 25 | Exh. C | Excerpts from the | Entirety | This document reflects |
| 26 | | Expert Report of Dr. | | information SonicWall has |
| 20 | | Nenad Medvidovic | | designated "Highly |
| 27 | | Regarding | | Confidential – Attorneys' |
| | | Infringement by | | Eyes Only" and "Highly |
| 28 | | SonicWall Inc. of | | Confidential – Attorneys' |



| 1 | | Patent Nos. 8,225,408; | | Eyes Only – Source Code" |
|-------------------|--------|-------------------------|----------|------------------------------|
| | | 7,975,305; and | | pursuant to the Stipulated |
| 2 | | 8,141,154, dated | | Protective Order, and from |
| 3 | | September 3, 2020 | | which confidential |
| 3 | | | | information regarding |
| 4 | | | | SonicWall's accused |
| • | | | | products could be |
| 5 | | | | potentially discerned. |
| | Exh. D | Excerpts from | Entirety | This document reflects |
| 6 | | Appendix G-4 to | - | information SonicWall has |
| 7 | | Finjan's Third | | designated "Highly |
| ′ | | Supplemental | | Confidential – Attorneys' |
| 8 | | Disclosure | | Eyes Only" and "Highly |
| | | Infringement | | Confidential – Attorneys' |
| 9 | | Contentions, dated | | Eyes Only – Source Code" |
| . | | December 11, 2019 | | pursuant to the Stipulated |
| 10 | | | | Protective Order, and from |
| $_{11} \parallel$ | | | | which confidential |
| 11 | | | | information regarding |
| 12 | | | | SonicWall's accused |
| | | | | products could be |
| 13 | | | | potentially discerned. |
| 14 | Exh. E | Excerpts from | Entirety | This document reflects |
| 14 | | Appendix G-3 to | - | information SonicWall has |
| 15 | | Finjan's Third | | designated "Highly |
| | | Supplemental | | Confidential – Attorneys' |
| 16 | | Disclosure | | Eyes Only" and "Highly |
| | | Infringement | | Confidential – Attorneys' |
| 17 | | Contentions, dated | | Eyes Only – Source Code" |
| 18 | | December 11, 2019 | | pursuant to the Stipulated |
| 10 | | | | Protective Order, and from |
| 19 | | | | which confidential |
| | | | | information regarding |
| 20 | | | | SonicWall's accused |
| _ | | | | products could be |
| 21 | | | | potentially discerned. |
| 22 | Exh. F | Excerpts from | Entirety | This document reflects |
| | | Appendix G-2 to | | information SonicWall has |
| 23 | | Finjan's First | | designated "Highly |
| | | Supplemental | | Confidential – Attorneys' |
| 24 | | Disclosure of Asserted | | Eyes Only" pursuant to the |
| 25 | | Claims and | | Stipulated Protective Order, |
| 25 | | Infringement | | and from which confidential |
| 26 | | Contentions and | | information regarding |
| _ | | Document Production | | SonicWall's accused |
| 27 | | Pursuant to Patent L.R. | | products could be |
| | | 3-1 and 3-2, dated | | potentially discerned. |
| 28 | | November 9, 2018 | | |



| _ | | ((C) + C 1 1 | I | |
|----|--------|---|----------|---|
| 1 | | ("First Supplemental Infringement | | |
| 2 | | Contentions") | | |
| 3 | Exh. G | Excerpts from Appendix E-2 to | Entirety | This document reflects information SonicWall has |
| 4 | | Finjan's Third | | designated "Highly |
| 5 | | Supplemental Disclosure | | Confidential – Attorneys' |
| | | Infringement | | Eyes Only" and "Highly Confidential – Attorneys' |
| 6 | | Contentions, dated | | Eyes Only – Source Code" |
| 7 | | December 11, 2019 | | pursuant to the Stipulated Protective Order, and from |
| 8 | | | | which confidential |
| | | | | information regarding |
| 9 | | | | SonicWall's accused products could be |
| 10 | | | | potentially discerned. |
| 11 | Exh. I | Excerpts from | Entirety | This document reflects |
| 12 | | Appendix D-2 to Finjan's First | | information SonicWall has designated "Highly |
| | | Supplemental | | Confidential – Attorneys' |
| 13 | | Infringement Contentions, dated | | Eyes Only" pursuant to the Stipulated Protective Order, |
| 14 | | November 9, 2018 | | and from which confidential |
| 15 | | , | | information regarding |
| 16 | | | | SonicWall's accused products could be |
| | | | | potentially discerned. |
| 17 | Exh. J | Excerpts from | Entirety | This document reflects |
| 18 | | Appendix D-3 to Finjan's Second | | information SonicWall has designated "Highly |
| 19 | | Supplemental | | Confidential – Attorneys' |
| | | Disclosure of Asserted | | Eyes Only" and "Highly |
| 20 | | Claims and Infringement | | Confidential – Attorneys' Eyes Only – Source Code" |
| 21 | | Contentions and | | pursuant to the Stipulated |
| 22 | | Document Production Pursuant to Patent L.R. | | Protective Order, and from |
| 23 | | 3-1 and 3-2, dated May | | which confidential information regarding |
| | | 31, 2019 ("Second | | SonicWall's accused |
| 24 | | Supplemental | | products could be |
| 25 | | Infringement Contentions") | | potentially discerned. |
| 26 | Exh. K | Excerpts from | Entirety | This document reflects |
| | | Appendix D-3 to Finjan's Third | | information SonicWall has designated "Highly |
| 27 | | Supplemental | | Confidential – Attorneys' |
| 28 | | Disclosure | | Eves Only" and "Highly |



| 1 | | Infringement | | Confidential – Attorneys' |
|-----------------|--------|---|----------|---|
| _ , | | Contentions, dated | | Eyes Only – Source Code" |
| 2 | | December 11, 2019 | | pursuant to the Stipulated |
| 3 | | | | Protective Order, and from which confidential |
| 4 | | | | information regarding |
| | | | | SonicWall's accused |
| 5 | | | | products could be |
| 6 | | | | potentially discerned. |
| اا | Exh. L | Excerpts from the | Entirety | This document reflects |
| 7 | | Expert Report of Dr. Michael Mitzenmacher | | information SonicWall has designated "Highly |
| $_{8}\parallel$ | | Regarding | | Confidential – Attorneys' |
| ° | | Infringement by | | Eyes Only" and "Highly |
| 9 | | SonicWall Inc. of | | Confidential – Attorneys' |
| | | Patent Nos. 6,804,780; | | Eyes Only – Source Code" |
| 10 | | 6,965,968; and | | pursuant to the Stipulated |
| 11 | | 7,613,926, dated | | Protective Order, and from |
| 11 | | September 3, 2020 | | which confidential |
| 12 | | , | | information regarding |
| | | | | SonicWall's accused |
| 13 | | | | products could be |
| 14 | | | | potentially discerned. |
| 14 | Exh. M | Excerpts from | Entirety | This document reflects |
| 15 | | Appendix H-1 to | | information SonicWall has |
| | | Finjan's Third | | designated "Highly |
| 16 | | Supplemental | | Confidential – Attorneys' |
| 17 | | Disclosure | | Eyes Only" and "Highly |
| 1 / | | Infringement | | Confidential – Attorneys' |
| 18 | | Contentions, dated | | Eyes Only – Source Code" |
| | | December 11, 2019 | | pursuant to the Stipulated |
| 19 | | | | Protective Order, and from which confidential |
| 20 | | | | information regarding |
| | | | | SonicWall's accused |
| 21 | | | | products could be |
| 22 | | | | potentially discerned. |
| ²² | Exh. N | Excerpts from | Entirety | This document reflects |
| 23 | | Appendix H-5 to | | information SonicWall has |
| 24 | | Finjan's Third | | designated "Highly |
| 24 | | Supplemental | | Confidential – Attorneys' |
| 25 | | Disclosure | | Eyes Only" and "Highly |
| | | Infringement Contentions, dated | | Confidential – Attorneys' |
| 26 | | December 11, 2019 | | Eyes Only – Source Code" pursuant to the Stipulated |
| 27 | | December 11, 2019 | | Protective Order, and from |
| 21 | | | | which confidential |
| 28 | | | | information regarding |



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