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14	Attorneys for Plaintiff FINJAN LLC			
15	UNITED STATES DISTRICT COURT			
16	NORTHERN DISTRICT OF CALIFORNIA			
17	(SAN JOSE	DIVISION)		
18				
19	FINJAN LLC, a Delaware Limited Liability	Case No. 5:17-cv-04467-BLF (VKD)		
20	Company,	DECLARATION OF K. NICOLE		
21	Plaintiff,	WILLIAMS IN SUPPORT OF FINJAN LLC'S ADMINISTRATIVE MOTION TO		
22	v.	FILE UNDER SEAL		
23	SONICWALL INC., a Delaware Corporation,			
24	Defendant.			
25				
26				
27				
28		Cose No. 5:17 av 04467 DLE (VVD)		



28 || **26 |**| I, K. Nicole Williams, hereby declare and state as follows:

- 1. I am licensed to practice in the State of California and am an associate in the law firm of Fish & Richardson P.C., counsel of record for Plaintiff Finjan LLC in the above-captioned matter. I have personal knowledge of all the facts contained herein and, if called as a witness, I could and would testify competently thereto.
- 2. I submit this declaration in support of Finjan's Administration Motion to File Under Seal its Opposition to SonicWall's Motion to Strike. As required under Civil L.R. 79-5(d)(1)(A), Civil L.R. 79-5(e), and this Court's Standing Order, the basis for asserting confidentiality and the grounds for filing under seal the documents listed below are as follows:

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

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1		Document Production		Protective Order, and from
		Pursuant to Patent L.R.		which confidential
2		3-1 and 3-2, dated		information regarding
3		December 11, 2019		SonicWall's accused
		("Third Supplemental		products could be
4		Infringement Contentions")		potentially discerned.
5	Exh. C	Excerpts from the	Entirety	This document reflects
6		Expert Report of Dr. Nenad Medvidovic		information SonicWall has designated "Highly
7		Regarding		Confidential – Attorneys'
·		Infringement by		Eyes Only" and "Highly
8		SonicWall Inc. of		Confidential – Attorneys'
		Patent Nos. 8,225,408;		Eyes Only – Source Code"
9		7,975,305; and		pursuant to the Stipulated
10		8,141,154, dated September 3, 2020		Protective Order, and from which confidential
11				information regarding SonicWall's accused
12				products could be
12				potentially discerned.
13	Exh. D	Excerpts from	Entirety	This document reflects
		Appendix G-4 to		information SonicWall has
14		Finjan's Third		designated "Highly
15		Supplemental		Confidential – Attorneys'
		Disclosure		Eyes Only" and "Highly
16		Infringement		Confidential – Attorneys'
17		Contentions, dated		Eyes Only – Source Code"
1 /		December 11, 2019		pursuant to the Stipulated
18				Protective Order, and from
				which confidential
19				information regarding SonicWall's accused
20				products could be
20				potentially discerned.
21	Exh. E	Excerpts from	Entirety	This document reflects
22		Appendix G-3 to Finjan's Third		information SonicWall has designated "Highly
23		Supplemental		Confidential – Attorneys'
		Disclosure		Eyes Only" and "Highly
24		Infringement		Confidential – Attorneys'
25		Contentions, dated		Eyes Only – Source Code"
23		December 11, 2019		pursuant to the Stipulated
26				Protective Order, and from
25				which confidential
27				information regarding SonicWall's accused
28				Case No. 5.17 ov. 0.4467 DLE (VVD)



			products could be
			potentially discerned.
Exh. F	Excerpts from Appendix G-2 to Finjan's First Supplemental Disclosure of Asserted Claims and Infringement Contentions and Document Production Pursuant to Patent L.R. 3-1 and 3-2, dated November 9, 2018 ("First Supplemental Infringement	Entirety	This document reflects information SonicWall has designated "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Protective Order, and from which confidential information regarding SonicWall's accused products could be potentially discerned.
Exh. G	Contentions")  Excerpts from Appendix E-2 to	Entirety	This document reflects information SonicWall has
	Finjan's Third		designated "Highly
	Supplemental Disclosure		Confidential – Attorneys' Eyes Only" and "Highly
	Infringement Contentions, dated		Confidential – Attorneys' Eyes Only – Source Code"
	December 11, 2019		pursuant to the Stipulated Protective Order, and from
			which confidential
			information regarding SonicWall's accused
			products could be potentially discerned.
Exh. I	Excerpts from Appendix D-2 to	Entirety	This document reflects information SonicWall has
	Finjan's First		designated "Highly
	Supplemental Infringement		Confidential – Attorneys' Eyes Only" pursuant to the
	Contentions, dated November 9, 2018		Stipulated Protective Order, and from which confidential
			information regarding SonicWall's accused
			products could be
Exh. J	Excerpts from	Entirety	potentially discerned.  This document reflects
	Appendix D-3 to Finjan's Second		information SonicWall has designated "Highly
	Supplemental		Confidential – Attorneys'
	Disclosure of Asserted		Eyes Only" and "Highly



ļ				
1		Claims and		Confidential – Attorneys'
2		Infringement		Eyes Only – Source Code"
		Contentions and		pursuant to the Stipulated
3		Document Production Pursuant to Patent L.R.		Protective Order, and from which confidential
4		3-1 and 3-2, dated May		information regarding
4		31, 2019 ("Second		SonicWall's accused
5		Supplemental		products could be
		Infringement		potentially discerned.
6		Contentions")		
7	Exh. K	Excerpts from	Entirety	This document reflects
		Appendix D-3 to		information SonicWall has
8		Finjan's Third Supplemental		designated "Highly Confidential – Attorneys"
9		Disclosure		Eyes Only" and "Highly
		Infringement		Confidential – Attorneys'
10		Contentions, dated		Eyes Only – Source Code"
11		December 11, 2019		pursuant to the Stipulated
				Protective Order, and from
12				which confidential
13				information regarding SonicWall's accused
				products could be
14				potentially discerned.
15	Exh. L	Excerpts from the	Entirety	This document reflects
		Expert Report of Dr.		information SonicWall has
16		Michael Mitzenmacher		designated "Highly
17		Regarding		Confidential – Attorneys'
1 /		Infringement by SonicWall Inc. of		Eyes Only" and "Highly
18		Patent Nos. 6,804,780;		Confidential – Attorneys' Eyes Only – Source Code"
19		6,965,968; and		pursuant to the Stipulated
19		7,613,926, dated		Protective Order, and from
20		September 3, 2020		which confidential
21				information regarding
21				SonicWall's accused
22				products could be
22	Exh. M	Evacents from	Entiroty	potentially discerned. This document reflects
23	L'AII. IVI	Excerpts from Appendix H-1 to	Entirety	information SonicWall has
24		Finjan's Third		designated "Highly
		Supplemental		Confidential – Attorneys'
25		Disclosure		Eyes Only" and "Highly
26		Infringement		Confidential – Attorneys'
		Contentions, dated		Eyes Only – Source Code"
27		December 11, 2019		pursuant to the Stipulated
28				Protective Order, and from
	l .		Λ	Case No. 5.17 ov MA67 RIE (VKD)



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