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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  
20 Company,  
21 Plaintiff,  
22 v.  
23 SONICWALL INC., a Delaware Corporation,  
24 Defendant.  
25

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

**DECLARATION OF K. NICOLE  
WILLIAMS IN SUPPORT OF FINJAN  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL**

1 I, K. Nicole Williams, hereby declare and state as follows:

2 1. I am licensed to practice in the State of California and am an associate in the law  
3 firm of Fish & Richardson P.C., counsel of record for Plaintiff Finjan LLC in the above-captioned  
4 matter. I have personal knowledge of all the facts contained herein and, if called as a witness, I could  
5 and would testify competently thereto.

6 2. I submit this declaration in support of Finjan's Administration Motion to File Under  
7 Seal its Opposition to SonicWall's Motion to Strike. As required under Civil L.R. 79-5(d)(1)(A),  
8 Civil L.R. 79-5(e), and this Court's Standing Order, the basis for asserting confidentiality and the  
9 grounds for filing under seal the documents listed below are as follows:  
10

11 ECF or Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
12 D313	13 Finjan's Opposition to 14 SonicWall's Motion to 15 Strike Finjan's Expert 16 Reports	17 Highlighted portions 18 at: 19 page 2, lines 12, 20- 20 25; 21 page 3, lines 1-7, 11- 22 13; 23 page 4, lines 14-21, 24 23-26; 25 page 5, lines 6-12, 14; 26 page 6, lines 3-10; 27 page 7, lines 1-2, 5, 28 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

1		Document Production Pursuant to Patent L.R. 3-1 and 3-2, dated December 11, 2019 (“Third Supplemental Infringement Contentions”)		Protective Order, and from which confidential information regarding SonicWall’s accused products could be potentially discerned.
2	Exh. C	Excerpts from the Expert Report of Dr. Nenad Medvidovic Regarding Infringement by SonicWall Inc. of Patent Nos. 8,225,408; 7,975,305; and 8,141,154, dated September 3, 2020	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 Protective Order, and from which confidential information regarding SonicWall’s accused products could be potentially discerned.
3	Exh. D	Excerpts from Appendix G-4 to Finjan’s Third Supplemental Disclosure Infringement Contentions, dated December 11, 2019	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 Protective Order, and from which confidential information regarding SonicWall’s accused products could be potentially discerned.
4	Exh. E	Excerpts from Appendix G-3 to Finjan’s Third Supplemental Disclosure Infringement Contentions, dated December 11, 2019	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 Protective Order, and from which confidential information regarding SonicWall’s accused

1			products could be potentially discerned.
2	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 Contentions")	Entirety
3			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.
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11	Exh. G	Excerpts from Appendix E-2 to Finjan's Third Supplemental Disclosure Infringement Contentions, dated December 11, 2019	Entirety
12			This document reflects information SonicWall has designated "Highly Confidential – Attorneys' Eyes Only" and "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.
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19	Exh. I	Excerpts from Appendix D-2 to Finjan's First Supplemental Infringement Contentions, dated November 9, 2018	Entirety
20			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.
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25	Exh. J	Excerpts from Appendix D-3 to Finjan's Second Supplemental Disclosure of Asserted	Entirety
26			This document reflects information SonicWall has designated "Highly Confidential – Attorneys' Eyes Only" and "Highly
27			
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1		Claims and Infringement Contentions and Document Production Pursuant to Patent L.R. 3-1 and 3-2, dated May 31, 2019 (“Second Supplemental Infringement Contentions”)		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.
2	Exh. K	Excerpts from Appendix D-3 to Finjan’s Third Supplemental Disclosure Infringement Contentions, dated December 11, 2019	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 Protective Order, and from which confidential information regarding SonicWall’s accused products could be potentially discerned.
3	Exh. L	Excerpts from the Expert Report of Dr. Michael Mitzenmacher Regarding Infringement by SonicWall Inc. of Patent Nos. 6,804,780; 6,965,968; and 7,613,926, dated September 3, 2020	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 Protective Order, and from which confidential information regarding SonicWall’s accused products could be potentially discerned.
4	Exh. M	Excerpts from Appendix H-1 to Finjan’s Third Supplemental Disclosure Infringement Contentions, dated December 11, 2019	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 Protective Order, and from

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