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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FINJAN, LLC, a Delaware Limited Liability
Company,

Plaintiff,

v.

SONICWALL INC., a Delaware Corporation,

Defendant.

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

**DECLARATION OF NICOLE E. GRIGG
IN SUPPORT OF SONICWALL INC.'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

1 I, Nicole E. Grigg, declare as follows:

2 1. I am an associate attorney at the law firm of Duane Morris LLP and am counsel for
 3 Defendant SonicWall, Inc. (“SonicWall”). I have personal knowledge of the matters set forth in this
 4 Declaration, and if called as a witness, could and would testify competently to such facts under oath.
 5 I submit this Declaration in support of SonicWall’s Administrative Motion to File Documents Under
 6 Seal pursuant to Civil L.R. 79-5(e). In making this Declaration, it is not my intention, nor the
 7 intention of SonicWall, to waive the attorney-client privilege, the attorney work-product immunity,
 8 or any other applicable privilege.

9 2. I have reviewed the following documents and confirmed that they consist of or quote
 10 directly from documents which either were designated under the Stipulated Protective Order by
 11 SonicWall or Finjan or contain information that SonicWall designated as “HIGHLY
 12 CONFIDENTIAL – ATTORNEYS’ EYES ONLY” or “HIGHLY CONFIDENTIAL –
 13 ATTORNEYS’ EYES ONLY – SOURCE CODE” pursuant to the Stipulated Protective Order in
 14 this litigation.

15 3. Documents to be filed under seal:

Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
	Defendant SonicWall, Inc.’s Motion for Summary Judgement	Highlighted portions at: Page 3: lines 2-7, 9-10, 14-15; Page 7: lines 12-13, 19-20, 23; Page 11: lines 2-3, 5-10, 18; Page 12: lines 1-4, 12-16; Page 14: lines 16-17; Page 17: lines 13-14, 18-20; Page 19: lines 15, 19, 22, 24-28; Page 20: lines 1-4, 6-9, 12, 16-23; Page 21: lines 6-8;	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.
3 to Gunther	Excerpts from the	Entirety	This document reflects information

Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
Declaration	September 3, 2020 Expert Report of Dr. Nenad Medvidovic Regarding Infringement by SonicWall, Inc. of Patent Nos. 8,225,408; 7,975,305; and 8,141,154		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. <i>See</i> Declaration of Nicole E. Grigg in Support of Administrative Motion to File Documents Under Seal (“Grigg Declaration”), ¶¶ 2-5.
4 to Gunther Declaration	Excerpts from the September 4, 2020 Expert Report of DeForest McDuff, Ph.D	Entirety	This document reflects 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 SonicWall’s confidential financial and business information. <i>See</i> Declaration of Nicole E. Grigg in Support of Administrative Motion to File Documents Under Seal (“Grigg Declaration”), ¶¶ 2-5.
5 to Gunther Declaration	Excerpts from the July 9, 2020 John Gmuender Deposition Transcript	Entirety	This document reflects testimony 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. <i>See</i> Declaration of Nicole E. Grigg in Support of Administrative Motion to File Documents Under Seal (“Grigg Declaration”), ¶¶ 2-5.
6 to Gunther Declaration	Excerpts from the July 16, 2020 Shunhui Zhu Deposition Transcript.	Entirety	This document reflects testimony that SonicWall has designated as “Highly Confidential – Attorneys’

Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
			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. <i>See</i> Declaration of Nicole E. Grigg in Support of Administrative Motion to File Documents Under Seal (“Grigg Declaration”), ¶¶ 2-5.
7 to Gunther Declaration	Excerpts from the July 29, 2020 Dmitriy Ayrapetov Deposition Transcript	Entirety	This document reflects testimony 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. <i>See</i> Declaration of Nicole E. Grigg in Support of Administrative Motion to File Documents Under Seal (“Grigg Declaration”), ¶¶ 2-5.
8 to Gunther Declaration	Excerpts from the July 24, 2020 Matt Neiderman Deposition Transcript	Entirety	This document reflects testimony 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. <i>See</i> Declaration of Nicole E. Grigg in Support of Administrative Motion to File Documents Under Seal (“Grigg Declaration”), ¶¶ 2-5.
14 to Gunther Declaration	Excerpts from the October 22, 2020 Eric	Entirety	This document reflects testimony that SonicWall has designated as

Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
	B. Cole, Ph.D. Deposition Transcript		"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.
15 to Gunther Declaration	Excerpts from the October 26, 2020 Michael Mitzenmacher, Ph.D. Deposition Transcript	Entirety	This document reflects testimony 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.
16 to Gunther Declaration	Excerpts from the October 29, 2020 Nenad Medvidovic, Ph.D. Deposition Transcript	Entirety	This document reflects testimony 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.
17 to Gunther Declaration	Excerpts from the September 3, 2020 Expert Report of Dr. Eric B. Cole Regarding Technology Tutorial and Infringement by SonicWall, Inc. of	Entirety	This document reflects testimony 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

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