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1	DUANE MORRIS LLP	DUANE MORRIS LLP			
2	D. Stuart Bartow (CA SBN 233107) dsbartow@duanemorris.com	Matthew C. Gaudet (GA SBN 287789) Admitted <i>Pro Hac Vice</i>			
3	Nicole E. Grigg (CA SBN 307733) negrigg@duanemorris.com	mcgaudet@duanemorris.com Robin L. McGrath (GA SBN 493115)			
4	2475 Hanover Street Palo Alto, CA 94304-1194	Admitted <i>Pro Hac Vice</i> rlmcgrath@duanemorris.com			
5	Telephone: 650.847.4150 Facsimile: 650.847.4151	David C. Dotson (GA SBN 138040) Admitted Pro Hac Vice			
6	DUANE MORRIS LLP	dcdotson@duanemorris.com Jennifer H. Forte (GA SBN 940650)			
7	Joseph A. Powers (PA SBN 84590) Admitted <i>Pro Hac Vice</i>	Admitted <i>Pro Hac Vice</i> jhforte@duanemorris.com			
8	japowers@duanemorris.com Jarrad M. Gunther (PA SBN 207038)	1075 Peachtree NE, Suite 2000 Atlanta, GA 30309			
9	Admitted <i>Pro Hac Vice</i> jmgunther@duanemorris.com	Telephone: 404.253.6900 Facsimile: 404.253.6901			
10	30 South 17th Street Philadelphia, PA 19103				
11	Telephone: 215.979.1000 Facsimile: 215.979.1020				
12	Attorneys for Defendant SONICWALL INC.				
13	SUNIC WALL INC.				
14	UNITED STATES	S DISTRICT COURT			
15	NORTHERN DIST	RICT OF CALIFORNIA			
16	SAN JOSE DIVISION				
17	FINJAN, LLC, a Delaware Limited Liability	Case No.: 5:17-cv-04467-BLF-VKD			
18	Company,	DECLARATION OF NICOLE E. GRIGG			
19	Plaintiff,	IN SUPPORT OF SONICWALL INC.'S ADMINISTRATIVE MOTION TO FILE			
20	V.	DOCUMENTS UNDER SEAL			
21	SONICWALL INC., a Delaware Corporation,				
22	Defendant.				
23					
24					
25					
26					
27					
28					

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I, Nicole E. Grigg, declare as follows:

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

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

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Documents to be filed under seal:

Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
	Defendant SonicWall,	Highlighted	The highlighted portions of this
	Inc's Motion for	portions at:	document reflect information that
	Summary Judgement	Page 3: lines 2-	SonicWall has designated as
		7, 9-10, 14-15;	"Highly Confidential – Attorneys"
		Page 7: lines 12-	Eyes Only" or "Highly
		13, 19-20, 23;	Confidential – Attorney's Eyes
		Page 11: lines 2-	Only – Source Code" pursuant to
		3, 5-10, 18;	the Stipulated Protective Order. I
		Page 12: lines 1-	filed publicly, this confidential
		4, 12-16;	information could be used to
		Page 14: lines	SonicWall's disadvantage by
		16-17;	competitors as it concerns the
		Page 17: lines	identification, organization, and o
		13-14, 18-20;	operation of SonicWall's
		Page 19: lines	proprietary products. See
		15, 19, 22, 24-	Declaration of Nicole E. Grigg in
		28; Page 20: lines 1-	Support of Administrative Motion to File Documents Under Seal
		4, 6-9, 12, 16-	("Grigg Declaration"), ¶¶ 2-5.
		23;	(Ongg Declaration), $\ $ 2-3.
		23, Page 21: lines 6-	
		8;	
3 to Gunther	Excerpts from the	Entirety	This document reflects information

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Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
Declaration	September 3, 2020 Expert Report of Dr		that SonicWall has designated as "Highly Confidential – Attorneys"
	Nenad Medvidovic Regarding		Eyes Only" or "Highly Confidential – Attorney's Eyes
	Infringement by SonicWall, Inc. of		Only – Source Code" pursuant to the Stipulated Protective Order. If
	Patent Nos. 8,225,408; 7,975,305; and		filed publicly, this confidential information could be used to
	8,141,154		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	September 4, 2020	Entirety	This document reflects information that SonicWall has designated as
	Expert Report of DeForest McDuff,		"Highly Confidential – Attorneys" Eyes Only" pursuant to the
	Ph.D		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	9, 2020 John	Entirety	This document reflects testimony that SonicWall has designated as
	Gmuender Deposition Transcript		"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
6 to Gunther	Excerpts from the July	Entirety	("Grigg Declaration"), ¶¶ 2-5. This document reflects testimony
Declaration	16, 2020 Shunhui Zhu Deposition Transcript.		that SonicWall has designated as "Highly Confidential – Attorneys'
	Declaration 4 to Gunther Declaration	DeclarationSeptember 3, 2020 Expert Report of Dr. Nenad Medvidovic Regarding Infringement by SonicWall, Inc. of Patent Nos. 8,225,408; 7,975,305; and 8,141,1544 to Gunther DeclarationExcerpts from the September 4, 2020 Expert Report of DeForest McDuff, Ph.D5 to Gunther DeclarationExcerpts from the July 9, 2020 John Gmuender Deposition Transcript6 to Gunther DeclarationExcerpts from the July 16, 2020 Shunhui Zhu	EXIL FOC Document Seal 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 Entirety 4 to Gunther Declaration Excerpts from the September 4, 2020 Expert Report of DeForest McDuff, Ph.D Entirety 5 to Gunther Declaration Excerpts from the July 9, 2020 John Gmuender Deposition Transcript Entirety 6 to Gunther Declaration Excerpts from the July 16, 2020 Shunhui Zhu Entirety

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	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	Entirety	This document reflects testimony that SonicWall has designated as
		Ayrapetov Deposition Transcript		"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 o operation of SonicWall's proprietary products. <i>See</i>
				Declaration of Nicole E. Grigg in Support of Administrative Motion
	<u> </u>			to File Documents Under Seal ("Grigg Declaration"), ¶¶ 2-5.
	8 to Gunther Declaration	Excerpts from the July 24, 2020 Matt Neiderman Deposition	Entirety	This document reflects testimony that SonicWall has designated as "Highly Confidential – Attorneys"
		Transcript		Eyes Only" or "Highly Confidential – Attorney's Eyes
				Only – Source Code" pursuant to the Stipulated Protective Order. I
				filed publicly, this confidential information could be used to SonicWall's disadvantage by
				competitors as it concerns the identification, organization, and o
				operation of SonicWall's proprietary products. <i>See</i>
				Declaration of Nicole E. Grigg in Support of Administrative Motion to File Documents Under Seal
	14 to Gunther	Excerpts from the	Entirety	("Grigg Declaration"), ¶¶ 2-5. This document reflects testimony
	Declaration	October 22, 2020 Eric		that SonicWall has designated as

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1		Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
2			B. Cole, Ph.D. Deposition Transprint		"Highly Confidential – Attorneys'
3			Deposition Transcript		Eyes Only" and "Highly Confidential – Attorneys' Eyes
4					Only - Source Code" pursuant to the Stipulated Protective Order. If
					filed publicly, this confidential
5					information could be used to SonicWall's disadvantage by
6					competitors as it concerns the
7					identification, organization, and or operation of SonicWall's
					proprietary products, including its
8					source code. <i>See</i> Grigg Declaration, ¶¶ 2-5.
9		15 to Gunther Declaration	Excerpts from the	Entirety	This document reflects testimony
10			October 26, 2020 Michael Mitzenmacher,		that SonicWall has designated as "Highly Confidential – Attorneys'
11			Ph.D. Deposition Transcript		Eyes Only" and "Highly Confidential – Attorneys' Eyes
			Transeript		Only - Source Code" pursuant to
12					the Stipulated Protective Order. If filed publicly, this confidential
13					information could be used to
14					SonicWall's disadvantage by competitors as it concerns the
15					identification, organization, and or
					operation of SonicWall's proprietary products, including its
16					source code. <i>See</i> Grigg Declaration, ¶¶ 2-5.
17		16 to Gunther	Excerpts from the	Entirety	This document reflects testimony
18		Declaration	October 29, 2020 Nenad Medvidovic,		that SonicWall has designated as "Highly Confidential – Attorneys'
			Ph.D. Deposition		Eyes Only" and "Highly
19			Transcript		Confidential – Attorneys' Eyes Only - Source Code" pursuant to
20					the Stipulated Protective Order. If filed publicly, this confidential
21					information could be used to
22					SonicWall's disadvantage by competitors as it concerns the
					identification, organization, and or
23					operation of SonicWall's proprietary products, including its
24					source code. See Grigg
25		17 to Gunther	Excerpts from the	Entirety	Declaration, ¶¶ 2-5. This document reflects testimony
26		Declaration	September 3, 2020 Expert Report of Dr.	-	that SonicWall has designated as "Highly Confidential – Attorneys'
			Eric B. Cole Regarding		Eyes Only" and "Highly
27			Technology Tutorial and Infringement by		Confidential – Attorneys' Eyes Only - Source Code" pursuant to
28			SonicWall, Inc. of		the Stipulated Protective Order. If

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