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14	UNITED STATES DISTRICT COURT				
15	NORTHERN DISTRICT OF CALIFORNIA				
16	(SAN JOSE DIVISION)				
17					
18	FINJAN LLC, a Delaware Limited Liability	Case No. 5:17-cv-04467-BLF (VKD)			
19	Company,	DECLARATION OF K. NICOLE			
20	Plaintiff,	WILLIAMS IN SUPPORT OF DEFENDANT SONICWALL INC.'S			
21	v.	ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL			
22	SONICWALL INC., a Delaware Corporation,	(ECF NO. 319)			
23	Defendant.	Date: January 14, 2021			
24		Time: 9:00 AM Judge: Hon. Beth Labson Freeman			
25		Dept: Courtroom 3, Fifth Floor			
26					
27					
28		G N 515 04465 DV 5 6WD			



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 ("Finjan") 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 SonicWall's Administration Motion to File Under Seal its Motion for Partial Summary Judgment (ECF No. 319), pursuant to Civil Local Rules 79-5(d)-(e) and this Court's Standing Order. The basis for asserting confidentiality and the grounds for filing the documents under seal are as follows:

ECF or	Document	Portion(s) to Seal	Reason(s) for Sealing	
Exh. No.				
Ex. 28 to	July 31, 2020 Plaintiff	Entirety	This document reflects	
Gunther	Finjan Inc.'s Third		information and testimony	
Declaration;	Supplemental		regarding Finjan's business	
ECF No.	Objections and		practices and licensing	
319-24	Responses to		negotiations, which Finjan	
	Defendant SonicWall		has designated "HIGHLY	
	Inc.'s First Set of		CONFIDENTIAL –	
	Interrogatories (No 6)		ATTORNEYS' EYES	
			ONLY" under the	
			Protective Order (ECF No.	
			68). Public disclosure of	
			this information would	
			cause harm to Finjan. See	
			Declaration of K. Nicole	
			Williams in Support of	
			SonicWall's	
			Administrative Motion to	
			File Under Seal ("Williams	
			Decl.") ¶ 3.	
Ex. 29 to	Excerpts from	Entirety	This document reflects	
Gunther	February 26, 2020		testimony regarding	
Declaration;	Deposition Transcript		Finjan's business practices	
ECF No.	of John Garland		and licensing negotiations,	
319-25			which Finjan has	
			designated "HIGHLY	
			CONFIDENTIAL –	
			ATTORNEYS' EYES	
1 Case No. 5:17-cv-04467 RI F (VKD)				

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1				ONLY" under the
$_{2}\parallel$				Protective Order (ECF No.
2				68). Public disclosure of
3				this information would
				cause harm to Finjan. <i>See</i> Williams Decl. ¶ 4.
4	Ex. 30 to	June 10-11, 2014	Entirety	This document reflects
5	Gunther	Email bearing BATES	Littlety	information regarding
	Declaration;	numbers Finjan-SW		Finjan's business practices
6	ECF No.	047868 – Finjan-SW		and licensing negotiations,
7	319-26	047869		which Finjan has
, I				designated "HIGHLY
8				CONFIDENTIAL –
9				ATTORNEYS' EYES
9				ONLY" under the Protective Order (ECF No.
10				68). Public disclosure of
				this information would
11				cause harm to Finjan. See
12				Williams Decl. ¶ 5.
	Ex. 31 to	November 25, 2014	Entirety	This document reflects
13	Gunther	Finjan Presentation		information regarding
14	Declaration	bearing BATES		Finjan's business practices
	ECF No.	numbers Finjan-SW		and licensing negotiations,
15	319-27	047884 – Finjan-SW 047924		which Finjan has designated "HIGHLY
16		047724		CONFIDENTIAL –
				ATTORNEYS' EYES
17				ONLY" under the
18				Protective Order (ECF No.
16				68). Public disclosure of
19				this information would
20				cause harm to Finjan. See
20	E 2240	Contombou 17, 2014	Entinotes	Williams Decl. ¶ 6.
21	Ex. 32 to Gunther	September 17, 2014 Email and	Entirety	This document reflects information regarding
22	Declaration	Attachments bearing		Finjan's business practices
23	ECF No. 319-28	BATES numbers FINJAN-SW 047936		and licensing negotiations, which Finjan has
23	317 20	- FINJAN-SW		designated "HIGHLY
24		047946		CONFIDENTIAL –
25				ATTORNEYS' EYES
25				ONLY" under the
26				Protective Order (ECF No.
				68). Public disclosure of this information would
27				uns information would
28			2 C	ase No. 5:17-cv-04467 RLF (VKD)
- 11			,	ASE IND A LIECVEUZZDI BLE (VKI)



		I	I	
1				cause harm to Finjan. See
$_{2}\parallel$	T. 22	0 1 10 2016		Williams Decl. ¶ 7.
_	Ex. 33 to	October 12, 2016	Entirety	This document reflects
3	Gunther Declaration	Finjan Presentation		information regarding Finjan's business practices
	ECF No.	bearing BATES numbers FINJAN-SW		and licensing negotiations,
4	319-29	047979 – FINJAN-		which Finjan has
5	317 27	SW 048008		designated "HIGHLY
		511 010000		CONFIDENTIAL –
6				ATTORNEYS' EYES
7				ONLY" under the
′				Protective Order (ECF No.
8				68). Public disclosure of
				this information would
9				cause harm to Finjan. See
10	7. 24	N. 1.20.2017.F. ''	n	Williams Decl. ¶ 8.
	Ex. 34 to	March 28, 2017 Email	Entirety	This document reflects
11	Gunther Declaration	and Attachments bearing BATES		information regarding Finjan's business practices
$_{12} \parallel$	ECF No.	numbers SonicWall-		and licensing negotiations,
12	319-30	Finjan_01044804 –		which Finjan has
13	317 30	SonicWall-		designated "HIGHLY
.		Finjan_01044812		CONFIDENTIAL –
14		3 –		ATTORNEYS' EYES
15				ONLY" under the
				Protective Order (ECF No.
16				68). Public disclosure of
17				this information would
1				cause harm to Finjan. See
18	Ex. 36 to	July 9 2014 Email	Entinaty	Williams Decl. ¶ 9. This document reflects
10	Gunther	July 8, 2014 Email and Attachment	Entirety	information regarding
19	Declaration	bearing BATES		Finjan's business practices
20	ECF No.	numbers FINJAN-SW		and licensing negotiations,
	319-31	047947 – FINJAN-		which Finjan has
21		SW 047952		designated "HIGHLY
22				CONFIDENTIAL –
				ATTORNEYS' EYES
23				ONLY" under the
24				Protective Order (ECF No.
24				68). Public disclosure of
25				this information would cause harm to Finjan. See
				Williams Decl. ¶ 10.
26	Ex. 37 to	November 21, 2016	Entirety	This document reflects
27	Gunther	Email bearing BATES	Zinitely	information regarding
	Declaration	numbers FINJAN-SW		Finjan's business practices
28		1	3 Cas	se No. 5:17-cy-04467 RI F (VKD)



1	ECF No.	047959 – FINJAN-		and licensing negotiations,
_	319-32	SW 047962		which Finjan has
2				designated "HIGHLY
3				CONFIDENTIAL –
3				ATTORNEYS' EYES
4				ONLY" under the
				Protective Order (ECF No.
5				68). Public disclosure of
				this information would
6				cause harm to Finjan. See
7				Williams Decl. ¶ 11.
´	Ex. 38 to	June 8, 2017 Finjan	Entirety	This document reflects
8	Gunther	Presentation bearing		information regarding
	Declaration	BATES numbers		Finjan's business practices
9	ECF No.	FINJAN-SW 146162		and licensing negotiations,
10	319-33	– FINJAN-SW		which Finjan has
10		146192		designated "HIGHLY
11				CONFIDENTIAL –
				ATTORNEYS' EYES
12				ONLY" under the
				Protective Order (ECF No.
13				68). Public disclosure of
14				this information would
14				cause harm to Finjan. See
15				Williams Decl. ¶ 12.

3. I have reviewed Exhibit 28 to the Declaration of Jarrad M. Gunther in Support of Defendant SonicWall Inc.'s Motion for Partial Summary Judgment ("Gunther Declaration"). (ECF No. 319-24.) Exhibit 28 to the Gunther Declaration reflects information and testimony regarding Finjan's business practices and licensing negotiations, which Finjan designated as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" subject to the Protective Order. Finjan treats this confidential business and licensing information as highly confidential within its business and makes substantial efforts not to disclose such information to the public. Such information could be used by Finjan's competitors, as it reveals information related to Finjan's business practices and dealings. Accordingly, good cause and compelling reasons exist to seal Ex. 28 to the Gunther Declaration.



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