1 2 3 4 5	Juanita R. Brooks (CA SBN 75934) brooks@fr.com Roger A. Denning (CA SBN 228998) denning@fr.com Jason W. Wolff (CA SBN 215819) wolff@fr.com John-Paul Fryckman (CA SBN 317591) fryckman@fr.com K. Nicole Williams (CA291900) nwilliams@fr.com FISH & RICHARDSON P.C. 12860 El Camino Real, Suite 400 San Diego, CA 92130 Telephone: (858) 678-5070 / Fax: (858) 678-5099			
6	Proshanto Mukherji (<i>Pro Hac Vice</i>) mukherji@fr.com			
7	FISH & RICHARDSON P.C. One Marina Park Drive			
8	Boston, MA 02210 Phone: (617) 542-5070/ Fax: (617) 542-5906			
9	Robert Courtney (CA SNB 248392) courtney@fr.com			
10	FISH & RICHARDSON P.C. 3200 RBC Plaza			
11	60 South Sixth Street Minneapolis, MN 55402 Phone: (612) 335-5070 / Fax: (612) 288-9696			
12				
13	Attorneys for Plaintiff FINJAN LLC			
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,	FINJAN LLC'S ADMINISTRATIVE		
20	Plaintiff,	MOTION TO FILE UNDER SEAL		
21	v.			
22	SONICWALL INC., a Delaware Corporation,			
23	Defendant.			
24				
25				
26				
27				
28				



I. INTRODUCTION

Plaintiff Finjan LLC ("Finjan"), having reviewed and complied with Civil Local Rule 79-

5, hereby moves the Court for permission to file under seal the following documents:

1

2

3

5	ECF or	Document	Portion(s) to Seal	Reason(s) for Sealing
	Exh. No.			
6	ECF 326	Finjan's Opposition to	Highlighted portions	The highlighted portions of
7		SonicWall's Motion	at page 2, lines 15-20;	this document reflect
´		for Partial Summary	page 3, lines 20-22;	information that SonicWall
8		Judgment	page 6, lines 2 and 16-	has designated as "Highly
9			22; page 7, lines 7-12	Confidential – Attorneys'
9			and 23-27; page 12, lines 21-27; page 13,	Eyes Only" or "Highly
10			lines 21-27, page 13, lines 2-8, 11, 13-14,	Confidential – Attorneys' Eyes Only – Source Code"
			and 26-27; page 15,	pursuant to the Stipulated
11			lines 20-21; page 16,	Protective Order, and from
12			lines 19-22 and 26-27;	which confidential
			page 17, lines 2-14	information regarding
13			and 25-27; page 18,	SonicWall's accused
14			lines 1-6, 9-10, and	products could potentially
14			15; page 19, lines 20-	be discerned.
15		2 1	21.	
.	Exh. A	Excerpts from the	Entirety	This document reflects
16		Expert Report of Dr. Nenad Medvidovic		information SonicWall has
17				designated "Highly
1,		Regarding Infringement by		Confidential – Attorneys' Eyes Only" and "Highly
18		SonicWall, Inc. of		Confidential – Attorneys'
10		Patent Nos. 8,225,408;		Eyes Only – Source Code"
19		7,975,305 and		pursuant to the Stipulated
20		8,141,154, dated		Protective Order, and from
		September 3, 2020		which confidential
21				information regarding
22				SonicWall's accused
				products could potentially
23	EID	F C1		be discerned.
24	Exh. B	Excerpts from the	Entirety	This deposition transcript
24		Deposition Transcript of Michael King taken		was designated by SonicWall as "Highly
25		July 24, 2020		Confidential – Attorneys'
<u>, </u>		July 21, 2020		Eyes Only" pursuant to the
26				Stipulated Protective Order,
27				and from which confidential
				information regarding
28				SonicWall's accused



Case 5:17-cv-04467-BLF Document 327 Filed 12/21/20 Page 3 of 9

				111
1				products could be
2				potentially discerned.
3	Exh. C	Excerpts from the Deposition Transcript	Entirety	This deposition transcript was designated by
4		of Shunhui Zhu taken		SonicWall as "Highly
5		July 16, 2020		Confidential – Attorneys'
				Eyes Only" pursuant to the Stipulated Protective Order,
6				and from which confidential
7				information regarding
				SonicWall's accused products could potentially
8				be discerned.
9	Exh. D	Excerpts from the	Entirety	This deposition transcript
10		Deposition Transcript of Eric Hawkes taken		was designated by SonicWall as "Highly
11		July 21, 2020		Confidential – Attorneys'
11				Eyes Only" pursuant to the
12				Stipulated Protective Order,
13				and from which confidential information regarding
				SonicWall's accused
14				products could potentially
15				be discerned.
16	Exh. E	Presentation Produced as SonicWall-	Entirety	This document reflects information SonicWall has
		Finjan_00549272-		designated "Highly
17		SonicWall-		Confidential – Attorneys'
18		Finjan_00549291		Eyes Only" pursuant to the Stipulated Protective Order,
19				and from which confidential
				information regarding
20				SonicWall's accused
21				products could potentially be discerned.
22	Exh. F	Excerpts from the	Entirety	This deposition contains
22		Deposition Transcript of Eric B. Cole, Ph.D.		information designated by SonicWall as "Highly
23		taken October 22, 2020		Confidential – Attorneys'
24		, ,		Eyes Only" pursuant to the
25				Stipulated Protective Order, and from which confidential
26				information regarding
27				SonicWall's accused products could potentially
28	Exh. G	Expert Report of	Entirety	be discerned. This document reflects
_0	ı exil. U	LEXUELL REDOIL OF	Ellilletv	rms document renects



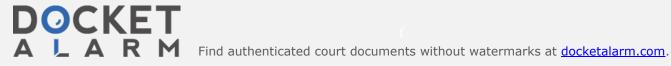
Case 5:17-cv-04467-BLF Document 327 Filed 12/21/20 Page 4 of 9

_				
1		Michael		information SonicWall has
$_{2}\parallel$		Mitzenmacher, Ph.D. Regarding		designated "Highly Confidential – Attorneys'
		Infringement of		Eyes Only" and "Highly
3		SonicWall, Inc. of		Confidential – Attorneys'
4		Patent Nos. 6,804,780;		Eyes Only – Source Code"
		6,965,968; and		pursuant to the Stipulated
5		7,613,926, dated		Protective Order, and from
6		September 3, 2020		which confidential
				information regarding SonicWall's accused
7				products could potentially
$_{8}\parallel$				be discerned.
	Exh. H	Excerpts from the	Entirety	This document reflects
9		Expert Report of Dr.	·	information SonicWall has
10		Eric Cole Regarding		designated "Highly
		Technology Tutorial		Confidential – Attorneys'
11		and Infringement by SonicWall, Inc. of		Eyes Only" and "Highly
12		Patent Nos. 6,154,844;		Confidential – Attorneys' Eyes Only – Source Code"
12		7,058,822; 7,647,633		pursuant to the Stipulated
13		and 8,677,494		Protective Order, and from
14				which confidential
14				information regarding
15				SonicWall's accused
16				products could potentially be discerned.
	Exh. I	Excerpts from the	Entirety	This deposition contains
17	22	Deposition Transcript	Lineacty	information designated by
18		of Kevin Almeroth,		SonicWall as "Highly
		Ph.D. taken October		Confidential – Attorneys'
19		21, 2020		Eyes Only" pursuant to the
20				Stipulated Protective Order, and from which confidential
20				information regarding
21				SonicWall's accused
$_{22} \parallel$				products could potentially
				be discerned.
23	Exh. J	Excerpt from the	Entirety	This deposition contains
24		Deposition Transcript of John Gmuender		information designated by SonicWall as "Highly
		taken July 9, 2020		Confidential – Attorneys'
25		, 2011 0 Gij 7, 2020		Eyes Only" pursuant to the
26				Stipulated Protective Order,
				and from which confidential
27				information regarding
28				SonicWall's accused products could potentially
11		I .		products could potentially



Case 5:17-cv-04467-BLF Document 327 Filed 12/21/20 Page 5 of 9

1				be discerned.
	Exh. K	Excerpt from the	Entirety	This deposition contains
2		Deposition Transcript		information designated by
3		of Patrick McDaniel,		SonicWall as "Highly
		Ph.D. taken October		Confidential – Attorneys'
4		23, 2020		Eyes Only" pursuant to the Stipulated Protective Order,
5				and from which confidential
				information regarding
6				SonicWall's accused
7				products could potentially
				be discerned.
8	Exh. L	SonicWall Document	Entirety	This document reflects
9		Produced as SonicWall-		information SonicWall has designated "Highly
		Finjan_00002532-		Confidential – Attorneys'
10		SonicWall-		Eyes Only" pursuant to the
11		Finjan_00002550		Stipulated Protective Order,
11				and from which confidential
12				information regarding
13				SonicWall's accused
13				products could potentially be discerned.
14	Exh. N	SonicWall Document	Entirety	This document reflects
15	DAII. IV	Produced as	Linencty	information SonicWall has
		SonicWall-		designated "Highly
16		Finjan_00002574-		Confidential – Attorneys'
17		SonicWall-		Eyes Only" pursuant to the
1 /		Finjan_00002592		Stipulated Protective Order, and from which confidential
18				information regarding
19				SonicWall's accused
17				products could potentially
20				be discerned.
21	Exh. P	SonicWall Document	Entirety	This document reflects
		Produced as SonicWall-		information SonicWall has
22		Finjan_00599079-		designated "Highly Confidential – Attorneys'
23		SonicWall-		Eyes Only" pursuant to the
		Finjan_00599109		Stipulated Protective Order,
24				and from which confidential
25				information regarding
				SonicWall's accused
26				products could potentially be discerned.
27	Exh. Q	SonicWall Document	Entirety	This document reflects
		Produced as		information SonicWall has
28		SonicWall-		designated "Highly



DOCKET A L A R M

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

