

1 Juanita R. Brooks (CA SBN 75934) brooks@fr.com
Roger A. Denning (CA SBN 228998) denning@fr.com
2 Jason W. Wolff (CA SBN 215819) wolff@fr.com
John-Paul Fryckman (CA SBN 317591) fryckman@fr.com
3 K. Nicole Williams (CA291900) nwilliams@fr.com
FISH & RICHARDSON P.C.
4 12860 El Camino Real, Suite 400
San Diego, CA 92130
5 Telephone: (858) 678-5070 / Fax: (858) 678-5099

6 Proshanto Mukherji (*Pro Hac Vice*) mukherji@fr.com
FISH & RICHARDSON P.C.
7 One Marina Park Drive
Boston, MA 02210
8 Phone: (617) 542-5070/ Fax: (617) 542-5906

9 Robert Courtney (CA SNB 248392) courtney@fr.com
FISH & RICHARDSON P.C.
10 3200 RBC Plaza
60 South Sixth Street
11 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
Company,
19
20 Plaintiff,
21 v.
22 SONICWALL INC., a Delaware Corporation,
23 Defendant.

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

7 2. I submit this declaration in support of Finjan's Administration Motion to File Under
8 Seal its Opposition to SonicWall's Motion for Partial Summary Judgment. As required under Civil
9 L.R. 79-5(d)(1)(A), Civil L.R. 79-5(e), and this Court's Standing Order, the basis for asserting
10 confidentiality and the grounds for filing under seal the documents listed below are as follows:
11

ECF or Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
ECF 326	Finjan's Opposition to SonicWall's Motion for Partial Summary Judgment	Highlighted portions at page 2, lines 15-20; page 3, lines 20-22; page 6, lines 2 and 16-22; page 7, lines 7-12 and 23-27; page 12, lines 21-27; page 13, lines 2-8, 11, 13-14, and 26-27; page 15, lines 20-21; page 16, lines 19-22 and 26-27; page 17, lines 2-14 and 25-27; page 18, lines 1-6, 9-10, and 15; page 19, lines 20-21.	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 potentially be discerned. (<i>See</i> Declaration of K. Nicole Williams In Support of Sealing ("Williams Sealing Decl.") ¶ 3.)
Exh. A	Excerpts from the Expert Report of Dr. Nenad Medvidovic Regarding Infringement by SonicWall, Inc. of Patent Nos. 8,225,408;	Entirety	This document reflects information SonicWall has designated "Highly Confidential – Attorneys' Eyes Only" and "Highly Confidential – Attorneys' Eyes Only – Source Code"

1		7,975,305 and 8,141,154, dated September 3, 2020		pursuant to the Stipulated Protective Order, and from which confidential information regarding SonicWall's accused products could potentially be discerned. (See Williams Sealing Decl. ¶ 4.)
2	Exh. B	Excerpts from the Deposition Transcript of Michael King taken July 24, 2020	Entirety	This deposition transcript was designated by SonicWall as "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. (See Williams Sealing Decl. ¶ 4.)
3	Exh. C	Excerpts from the Deposition Transcript of Shunhui Zhu taken July 16, 2020	Entirety	This deposition transcript was designated by SonicWall as "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Protective Order, and from which confidential information regarding SonicWall's accused products could potentially be discerned. (See Williams Sealing Decl. ¶ 4.)
4	Exh. D	Excerpts from the Deposition Transcript of Eric Hawkes taken July 21, 2020	Entirety	This deposition transcript was designated by SonicWall as "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Protective Order, and from which confidential information regarding SonicWall's accused products could potentially be discerned. (See Williams Sealing Decl. ¶ 4.)
5	Exh. E	Presentation Produced as SonicWall-	Entirety	This document reflects information SonicWall has

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

1		Finjan_00549272- SonicWall- Finjan_00549291		designated “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order, and from which confidential information regarding SonicWall’s accused products could potentially be discerned. (See Williams Sealing Decl. ¶ 4.)
2				
3				
4				
5				
6				
7	Exh. F	Excerpts from the Deposition Transcript of Eric B. Cole, Ph.D. taken October 22, 2020	Entirety	This deposition contains information designated by SonicWall as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order, and from which confidential information regarding SonicWall’s accused products could potentially be discerned. (See Williams Sealing Decl. ¶ 4.)
8				
9				
10				
11				
12				
13				
14	Exh. G	Expert Report of Michael Mitzenmacher, Ph.D. Regarding Infringement of 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 potentially be discerned. (See Williams Sealing Decl. ¶ 4.)
15				
16				
17				
18				
19				
20				
21				
22	Exh. H	Excerpts from the Expert Report of Dr. Eric Cole Regarding Technology Tutorial and Infringement by SonicWall, Inc. of Patent Nos. 6,154,844; 7,058,822; 7,647,633 and 8,677,494	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
23				
24				
25				
26				
27				
28				

1			information regarding SonicWall's accused products could potentially be discerned. (See Williams Sealing Decl. ¶ 4.)
2			
3			
4	Exh. I	Excerpts from the Deposition Transcript of Kevin Almeroth, Ph.D. taken October 21, 2020	Entirety
5			This deposition contains information designated by SonicWall as "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Protective Order, and from which confidential information regarding SonicWall's accused products could potentially be discerned. (See Williams Sealing Decl. ¶ 4.)
6			
7			
8			
9			
10			
11	Exh. J	Excerpt from the Deposition Transcript of John Gmuender taken July 9, 2020	Entirety
12			This deposition contains information designated by SonicWall as "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Protective Order, and from which confidential information regarding SonicWall's accused products could potentially be discerned. (See Williams Sealing Decl. ¶ 4.)
13			
14			
15			
16			
17			
18	Exh. K	Excerpt from the Deposition Transcript of Patrick McDaniel, Ph.D. taken October 23, 2020	Entirety
19			This deposition contains information designated by SonicWall as "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Protective Order, and from which confidential information regarding SonicWall's accused products could potentially be discerned. (See Williams Sealing Decl. ¶ 4.)
20			
21			
22			
23			
24			
25	Exh. L	SonicWall Document Produced as SonicWall-Finjan_00002532-SonicWall-Finjan_00002550	Entirety
26			This document reflects information SonicWall has designated "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Protective Order,
27			
28			

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.