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13	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,	Case No. 5:17-cv-04467-BLF (VKD)			
19	Plaintiff,	DECLARATION OF K. NICOLE WILLIAMS IN SUPPORT OF FINJAN LLC'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL			
20   21	V.				
$\begin{bmatrix} 21 \\ 22 \end{bmatrix}$	SONICWALL INC., a Delaware Corporation,				
23	Defendant.				
24					
25					
26					
27					
28					



DOCKET A L A R M

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

Ш	ECF or	Document	Portion(s) to Seal	Reason(s) for Sealing
	Exh. No.			
	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. (See 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"

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1		7,975,305 and		pursuant to the Stipulated
2		8,141,154, dated September 3, 2020		Protective Order, and from which confidential
3		, 2020		information regarding SonicWall's accused
4				products could potentially
5				be discerned. ( <i>See</i> Williams Sealing Decl. ¶ 4.)
6	Exh. B	Excerpts from the	Entirety	This deposition transcript
7		Deposition Transcript of Michael King taken		was designated by SonicWall as "Highly
		July 24, 2020		Confidential – Attorneys' Eyes Only" pursuant to the
8				Stipulated Protective Order,
9				and from which confidential information regarding
10				SonicWall's accused
11				products could be potentially discerned. (See
12				Williams Sealing Decl. ¶ 4.)
13	Exh. C	Excerpts from the	Entirety	This deposition transcript
14		Deposition Transcript of Shunhui Zhu taken		was designated by SonicWall as "Highly
15		July 16, 2020		Confidential – Attorneys'
				Eyes Only" pursuant to the
16				Stipulated Protective Order,
17				and from which confidential information regarding
				SonicWall's accused
18				products could potentially
19				be discerned. (See Williams
				Sealing Decl. ¶ 4.)
20	Exh. D	Excerpts from the	Entirety	This deposition transcript was designated by
21		Deposition Transcript of Eric Hawkes taken		SonicWall as "Highly
22		July 21, 2020		Confidential – Attorneys' Eyes Only" pursuant to the
23				Stipulated Protective Order,
24				and from which confidential information regarding
				SonicWall's accused
25				products could potentially be discerned. ( <i>See</i> Williams
26				Sealing Decl. ¶ 4.)
27	Exh. E	Presentation Produced	Entirety	This document reflects
		as SonicWall-	-	information SonicWall has
28			2	Casa No. 5:17 av 04/67 RI F (VKD)



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1		Finjan_00549272-		designated "Highly
_		SonicWall-		Confidential – Attorneys'
2		Finjan_00549291		Eyes Only" pursuant to the
3				Stipulated Protective Order,
٠				and from which confidential
4				information regarding
_				SonicWall's accused
5				products could potentially
6				be discerned. (See Williams
0				Sealing Decl. ¶ 4.)
7	Exh. F	Excerpts from the	Entirety	This deposition contains
		Deposition Transcript		information designated by
8		of Eric B. Cole, Ph.D.		Sonic Wall as "Highly
9		taken October 22, 2020		Confidential – Attorneys'
				Eyes Only" pursuant to the
10				Stipulated Protective Order, and from which confidential
				information regarding
11				SonicWall's accused
12				products could potentially
12				be discerned. (See Williams
13				Sealing Decl. ¶ 4.)
	Exh. G	Expert Report of	Entirety	This document reflects
14		Michael		information SonicWall has
15		Mitzenmacher, Ph.D.		designated "Highly
		Regarding		Confidential – Attorneys'
16		Infringement of		Eyes Only" and "Highly
		SonicWall, Inc. of		Confidential – Attorneys'
17		Patent Nos. 6,804,780;		Eyes Only – Source Code"
18		6,965,968; and		pursuant to the Stipulated
		7,613,926, dated		Protective Order, and from
19		September 3, 2020		which confidential
_				information regarding
20				Sonic Wall's accused
21				products could potentially
				be discerned. (See Williams
22	Exh. H	Excerpts from the	Entirety	Sealing Decl. ¶ 4.) This document reflects
22	EXII. 11	Expert Report of Dr.	Enthety	information SonicWall has
23		Expert Report of Dr.  Eric Cole Regarding		designated "Highly
24		Technology Tutorial		Confidential – Attorneys'
		and Infringement by		Eyes Only" and "Highly
25		SonicWall, Inc. of		Confidential – Attorneys'
26		Patent Nos. 6,154,844;		Eyes Only – Source Code"
26		7,058,822; 7,647,633		pursuant to the Stipulated
27		and 8,677,494		Protective Order, and from
		, ,		which confidential
28			2	Case No. 5:17 ev 0//67 RLF (VKD)



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1				information regarding
$_{2}\parallel$				SonicWall's accused
				products could potentially be discerned. (See Williams
3				Sealing Decl. ¶ 4.)
4	Exh. I	Excerpts from the	Entirety	This deposition contains
7		Deposition Transcript		information designated by
5		of Kevin Almeroth,		SonicWall as "Highly
		Ph.D. taken October		Confidential – Attorneys'
6		21, 2020		Eyes Only" pursuant to the
7				Stipulated Protective Order,
				and from which confidential
8				information regarding SonicWall's accused
9				products could potentially
				be discerned. (See Williams
10				Sealing Decl. ¶ 4.)
11	Exh. J	Excerpt from the	Entirety	This deposition contains
		Deposition Transcript		information designated by
12		of John Gmuender		SonicWall as "Highly
13		taken July 9, 2020		Confidential – Attorneys'
13				Eyes Only" pursuant to the
14				Stipulated Protective Order, and from which confidential
15				information regarding
15				SonicWall's accused
16				products could potentially
1.7				be discerned. (See Williams
17				Sealing Decl. ¶ 4.)
18	Exh. K	Excerpt from the	Entirety	This deposition contains
		Deposition Transcript		information designated by
19		of Patrick McDaniel, Ph.D. taken October		SonicWall as "Highly Confidential – Attorneys'
20		23, 2020		Eyes Only" pursuant to the
		23, 2020		Stipulated Protective Order,
21				and from which confidential
22				information regarding
				SonicWall's accused
23				products could potentially
24				be discerned. (See Williams
<del>۷4</del>	Exh. L	SonicWall Document	Entirety	Sealing Decl. ¶ 4.) This document reflects
25	EXII. L	Produced as	Entirety	information SonicWall has
26		SonicWall-		designated "Highly
26		Finjan_00002532-		Confidential – Attorneys'
27		SonicWall-		Eyes Only" pursuant to the
		Finjan_00002550		Stipulated Protective Order,
28			<u></u>	Casa No. 5:17 av 04/67 RI F (VKD)



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