

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.  
24

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

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

13 ECF or Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
14 ECF 326	15 Finjan's Opposition to 16 SonicWall's Motion 17 for Partial Summary 18 Judgment	19 Highlighted portions 20 at page 2, lines 15-20; 21 page 3, lines 20-22; 22 page 6, lines 2 and 16- 23 22; page 7, lines 7-12 24 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.)
25 Exh. A	26 Excerpts from the 27 Expert Report of Dr. Nenad Medvidovic Regarding Infringement by	Entirety	This document reflects information SonicWall has designated "Highly Confidential – Attorneys' Eyes Only" and "Highly

1		SonicWall, Inc. of Patent Nos. 8,225,408; 7,975,305 and 8,141,154, dated September 3, 2020		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.)
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.)
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1	Exh. E	Presentation Produced as SonicWall- Finjan_00549272- SonicWall- Finjan_00549291	Entirety	This document reflects information SonicWall has 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.)
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8	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.)
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15	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.)
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24	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	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
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1		and 8,677,494		Protective Order, and from which confidential information regarding SonicWall's accused products could potentially be discerned. (See Williams Sealing Decl. ¶ 4.)
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5	Exh. I	Excerpts from the Deposition Transcript of Kevin Almeroth, Ph.D. taken October 21, 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.)
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12	Exh. J	Excerpt from the Deposition Transcript of John Gmuender taken July 9, 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.)
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19	Exh. K	Excerpt from the Deposition Transcript of Patrick McDaniel, Ph.D. taken October 23, 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.)
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26	Exh. L	SonicWall Document Produced as SonicWall-Finjan_00002532-	Entirety	This document reflects information SonicWall has designated "Highly Confidential – Attorneys'
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