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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FINJAN, LLC, a Delaware Limited Liability
Company,

Plaintiff,

vs.

SONICWALL INC., a Delaware
Corporation

Defendant.

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

**DECLARATION OF NICOLE E.
GRIGG IN SUPPORT OF PLAINTIFF
FINJAN, LLC'S CORRECTED
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL (ECF NO.
329)**

1 I, Nicole E. Grigg, declare as follows:

2 1. I am an associate at the law firm of Duane Morris LLP and am counsel for Defendant
3 SonicWall Inc. (“SonicWall”). I have personal knowledge of the matters set forth in this
4 Declaration, and if called as a witness, could and would testify competently to such facts under oath.
5 I submit this Declaration in Support of Finjan’s Corrected Administrative Motion to File Documents
6 Under Seal (ECF No. 329), pursuant to Civil Local Rule 79-5(d)-(e). In making this Declaration, it
7 is not my intention, nor the intention of SonicWall, to waive the attorney-client privilege, the
8 attorney work-product immunity, or any other applicable privilege.

9 2. I have reviewed page 2, lines 15-20; page 3, lines 20-22; page 6, lines 2 and 16-22;
10 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,
11 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,
12 and 15; page 19, lines 20-21 of Finjan’s Opposition to SonicWall’s Motion for Partial Summary
13 Judgment as well as Exhibits A, B, C, D, E, F, G, H, I, J, K, L, N, P, Q, R, S and T to the Declaration
14 of Jason Wolff in support of Finjan LLC’s Opposition to SonicWall’s Motion for Partial Summary
15 Judgment and confirmed that the foregoing documents Finjan attached to its Administrative Motion
16 to Seal contains SonicWall’s confidential information.

17 3. Specifically, Exhibits A, G, and H contain excerpts from Finjan’s expert reports
18 which cite to and quote SonicWall’s confidential technical information that SonicWall has
19 designated as “Confidential – Attorneys’ Eyes Only” and “Confidential – Attorneys’ Eyes only –
20 Source Code” pursuant to the Protective Order. Exhibits B, C, D, F, I, J, K, and S are excerpts from
21 deposition transcripts that contain testimony that SonicWall has designated as “Highly Confidential
22 – Attorneys’ Eyes Only” or “Highly Confidential – Attorneys’ Eyes Only – Source Code” pursuant
23 to the Protective Order. Exhibits E, L, N, P, and Q are SonicWall presentations or technical
24 specifications that contain SonicWall’s confidential technical information that SonicWall designated
25 as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order. Exhibit R is an
26 internal SonicWall email produced by SonicWall that contains confidential technical information
27 that SonicWall designated as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the
28 Protective Order. Exhibit T is an email that reflects SonicWall’s confidential technical information

1 designated as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order.
2 Additionally, page 2, lines 15-20; page 3, lines 20-22; page 6, lines 2 and 16-22; page 7, lines 7-12
3 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
4 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,
5 lines 20-21 of Finjan’s Opposition to SonicWall’s Motion for Partial Summary Judgment include
6 references to SonicWall’s technical specifications as well as Finjan’s expert reports, all of which
7 contain information that SonicWall has designated as “Highly Confidential – Attorneys’ Eyes Only”
8 or “Highly Confidential – Attorneys’ Eyes Only – Source Code” pursuant to the Protective Order.
9 If filed publicly, this confidential information could be used to SonicWall’s disadvantage by
10 competitors as it concerns the identification, organization, operation, and source code related to
11 SonicWall’s proprietary products.

12 4. Accordingly, Sonicwall does seek to seal page 2, lines 15-20; page 3, lines 20-22;
13 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,
14 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-
15 27; page 18, lines 1-6, 9-10, and 15; page 19, lines 20-21 of Finjan’s Opposition to SonicWall’s
16 Motion for Partial Summary Judgment as well as Exhibits A, B, C, D, E, F, G, H, I, J, K, L, N, P,
17 Q, R, S and T to the Declaration of Jason Wolff in support of Finjan LLC’s Opposition to
18 SonicWall’s Motion for Partial Summary Judgment.

19 I declare under penalty of perjury under the laws of California and the United States that the
20 foregoing is true and correct. Executed on December 28, 2020, in Alameda, CA.

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22 /s/ Nicole E. Grigg
23 Nicole E. Grigg
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