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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,	DECLARATION OF K. NICOLE WILLIAMS IN SUPPORT OF FINJAN LLC'S OMNIBUS ADMINISTRATIVE MOTION TO FILE UNDER SEAL			
20	Plaintiff,				
21	V.				
22	SONICWALL INC., a Delaware Corporation,				
23	Defendant.				
24		-			
25					
26					
27					
28					



24

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 LLC's Omnibus Administration Motion to File Under Seal its Motions to Preclude Trial Testimony Relating to Written Description (ECF No. 348) and Motion to Preclude Trial Testimony Relating to Written Description (ECF No. 350). 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:

ECF or	Document	Portion(s) to Seal	Reason(s) for Sealing
Exh. No.			
ECF 348	Finjan LLC's Motion	Highlighted portions	The highlighted portions of
	To Preclude Trial	at page 2, lines 21-22;	this document reflect
	Testimony Relating to	page 3, lines 16-19,	information SonicWall has
	Written Description	21-22; page 4, line 8	designated "Highly
			Confidential – Attorneys'
			Eyes Only" pursuant to the
			Stipulated Protective Order
			(ECF No. 68), and from
			which confidential
			information regarding
			SonicWall's accused
			products could potentially
			be discerned.
Exh. A	Excerpts from the	Entirety	This document reflects
(ECF	Expert Report of Dr.		information SonicWall has
348-2)	Avi Rubin Regarding		designated "Highly
	Invalidity of U.S.		Confidential – Attorneys'
	Patent No. 8,225,408,		Eyes Only" pursuant to the
	U.S. Patent No.		Stipulated Protective Order.
	7,975,305, U.S. Patent		
	No. 7,613,926 and U.S.		
	Patent No. 6,965,968		

5.17 ov 04/67 RLE (VKF

1		dated September 4, 2020		
2	Exh. B	Excerpts from the	Entirety	This document was
3	(ECF 348-3)	Expert Report of Dr. Kevin Almeroth on		designated by SonicWall as "Highly Confidential –
4		Invalidity of U.S.		Attorneys' Eyes Only"
5		Patent Nos. 6,154,844 and 8,141,154 dated September 4, 2020		pursuant to the Stipulated Protective Order.
6	Exh. C	Excerpts from the	Entirety	This document was
7	(ECF 348-4)	Expert Report of Dr. Patrick McDaniel		designated by SonicWall as "Highly Confidential –
8	310 1)	Regarding the		Attorneys' Eyes Only"
9		Invalidity of the '494 and '780 Patents dated		pursuant to the Stipulated Protective Order.
10	Exh. D	September 4, 2020 Excerpt from the	Entirety	This deposition transcript
11	(ECF	Deposition Transcript	Zhithety	was designated by
12	348-5)	of Avi Rubin, Ph.D. taken October 29, 2020		SonicWall as "Highly Confidential" pursuant to
13				the Stipulated Protective Order.
14	Exh. F	Excerpt from the	Entirety	This deposition transcript
	(ECF 348-7)	Deposition Transcript of Patrick McDaniel,		was designated by SonicWall as "Highly
15	340-7)	Ph.D. taken October		Confidential – Attorneys'
16		23, 2020		Eyes Only" pursuant to the
17	ECF 350	Finjan LLC's Motion	Highlighted portions	Stipulated Protective Order. The highlighted portions of
18		to Preclude Trial	at page 3, lines 21-24;	this document reflect
19		Testimony from Stephen Becker, Ph.D.	page 4, lines 9-11	information SonicWall has designated "Highly
		1		Confidential – Attorneys'
20				Eyes Only" pursuant to the Stipulated Protective Order,
21				and from which confidential
22				information regarding SonicWall's accused
23				products could potentially
24	Exh. A	Excerpts from the	Entirety	be discerned. This document was
25	(ECF	Expert Report of		designated by SonicWall as
	350-2)	Stephen L. Becker, Ph.D. on Behalf of		"Confidential – Outside Counsel Only" pursuant to
26		Defendant dated		the Stipulated Protective
27		October 9, 2020		Order. Confidential
28			2	information regarding Case No. 5:17 ov 04467 RI E (VKD)



1				SonicWall's accused
2				products could potentially
2				be discerned from this
3				document.
	Exh. B	Excerpts from the	Entirety	This document was
4	(ECF	Errata to Expert Report		designated by SonicWall as
5	350-3)	of Stephen L. Becker, Ph.D. on Behalf of		"Confidential – Outside
³		Defendant dated		Counsel Only" pursuant to the Stipulated Protective
6		October 28, 2020		Order. Confidential
_		October 20, 2020		information regarding
7				SonicWall's accused
$_{8}\parallel$				products could potentially
				be discerned from this
9				document.
10	Exh. C	Excerpts from the	Entirety	This deposition transcript
10	(ECF	Deposition Transcript		was designated by
11	350-4)	of Stephen Becker,		SonicWall as "Confidential
.		Ph.D. taken October		- Outside Counsel Eyes
12		29, 2020		Only" pursuant to the
13				Stipulated Protective Order, and from which confidential
				information regarding
14				SonicWall's accused
15				products could potentially
13				be discerned.
16	Exh. D	Excerpts from the	Entirety	This document reflects
1.7	(ECF	Expert Report of	-	information SonicWall has
17	350-5)	DeForest McDuff,		designated "Highly
18		Ph.D. dated September		Confidential – Attorneys'
		4, 2020		Eyes Only" pursuant to the
19				Stipulated Protective Order,
20				and from which confidential
20				information regarding SonicWall's accused
21				products could potentially
22				be discerned.
22	Exh. E	Plaintiff Finjan, Inc.'s	Entirety	This document reflects
23	(ECF	Third Supplemental		information regarding
	350-6)	Objections and		Finjan's internal business
24		Responses to		practices and licensing
25		Defendant SonicWall,		negotiations, which Finjan
23		Inc.'s First Set of		has designated "HIGHLY
26		Interrogatories (No. 6)		CONFIDENTIAL –
		dated July 31, 2020		ATTORNEYS' EYES ONLY" under the Protective
27				Order (ECF No. 68). Public
28		l	2	Case No. 5:17 ev 0/467 RIF (VKD)



1				disclosure of this
				information would cause
2				harm to Finjan. See
3				Declaration of K. Nicole
				Williams in Support of
4				SonicWall's Administrative Motion to File Under Seal
5				("Williams Decl.") ¶ 7.
				This document also reflects
6				information SonicWall has
7				designated "Highly
, l				Confidential – Attorneys'
8				Eyes Only" pursuant to the
9				Stipulated Protective Order,
9				and from which confidential information regarding
10				SonicWall's accused
11				products could potentially
11				be discerned.
12	Exh. F	Excerpts from the	Entirety	This document was
10	(ECF	Supplement to Expert		designated by SonicWall as
13	350-7)	Report of Stephen L.		"Confidential – Outside
14		Becker on Behalf of		Counsel Only" pursuant to
		Defendant dated December 22, 2020		the Stipulated Protective Order. Confidential
15		December 22, 2020		information regarding
16				SonicWall's accused
				products could potentially
17				be discerned from this
18				document.
	3.	The highlighted newtice	os of Finian IIC's M	otion to Preclude Trial Testimony
19	3.	The inginighted portion	is of Filijail LLC 8 M(on to Frectude 111at resultiony
20	Dogondina V	Written Description (ECE	No. 249) noflect infect	wastion ComicWell has designated

- 3. The highlighted portions of Finjan LLC's Motion to Preclude Trial Testimony Regarding Written Description (ECF No. 348) reflect information SonicWall has designated "HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY" under the Protective Order, and from which confidential information regarding SonicWall's accused products could potentially be discerned.
- 4. Exhibits A–D and F to the Declaration of Robert Courtney in support of Motion to Preclude Trial Regarding Written Description ("Courtney Written Description Decl.") reflect



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