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12 Attorneys for Plaintiff
13 FINJAN LLC

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 (SAN JOSE DIVISION)

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 OMNIBUS 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 LLC's Omnibus Administration Motion
7 to File Under Seal its Motions to Preclude Trial Testimony Relating to Written Description (ECF
8 No. 348) and Motion to Preclude Trial Testimony Relating to Written Description (ECF No. 350).
9 As required under Civil L.R. 79-5(d)(1)(A), Civil L.R. 79-5(e), and this Court's Standing Order, the
10 basis for asserting confidentiality and the grounds for filing under seal the documents listed below
11 are as follows:
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ECF or Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
ECF 348	Finjan LLC's Motion To Preclude Trial Testimony Relating to Written Description	Highlighted portions at page 2, lines 21-22; page 3, lines 16-19, 21-22; page 4, line 8	The highlighted portions of this document reflect information SonicWall has 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 (ECF 348-2)	Excerpts from the Expert Report of Dr. Avi Rubin Regarding Invalidity of U.S. Patent No. 8,225,408, U.S. Patent No. 7,975,305, U.S. Patent No. 7,613,926 and U.S. Patent No. 6,965,968	Entirety	This document reflects information SonicWall has designated "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Protective Order.

1		dated September 4, 2020		
2	Exh. B (ECF 348-3)	Excerpts from the Expert Report of Dr. Kevin Almeroth on Invalidity of U.S. Patent Nos. 6,154,844 and 8,141,154 dated September 4, 2020	Entirety	This document was designated by SonicWall as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order.
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6	Exh. C (ECF 348-4)	Excerpts from the Expert Report of Dr. Patrick McDaniel Regarding the Invalidity of the ’494 and ’780 Patents dated September 4, 2020	Entirety	This document was designated by SonicWall as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order.
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10	Exh. D (ECF 348-5)	Excerpt from the Deposition Transcript of Avi Rubin, Ph.D. taken October 29, 2020	Entirety	This deposition transcript was designated by SonicWall as “Highly Confidential” pursuant to the Stipulated Protective Order.
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14	Exh. F (ECF 348-7)	Excerpt from the Deposition Transcript of Patrick McDaniel, Ph.D. taken October 23, 2020	Entirety	This deposition transcript was designated by SonicWall as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order.
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17	ECF 350	Finjan LLC’s Motion to Preclude Trial Testimony from Stephen Becker, Ph.D.	Highlighted portions at page 3, lines 21-24; page 4, lines 9-11	The highlighted portions of this document reflect 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.
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24	Exh. A (ECF 350-2)	Excerpts from the Expert Report of Stephen L. Becker, Ph.D. on Behalf of Defendant dated October 9, 2020	Entirety	This document was designated by SonicWall as “Confidential – Outside Counsel Only” pursuant to the Stipulated Protective Order. Confidential information regarding
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1			SonicWall's accused products could potentially be discerned from this document.
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3	Exh. B (ECF 350-3)	Excerpts from the Errata to Expert Report of Stephen L. Becker, Ph.D. on Behalf of Defendant dated October 28, 2020	Entirety
4			This document was designated by SonicWall as "Confidential – Outside Counsel Only" pursuant to the Stipulated Protective Order. Confidential information regarding SonicWall's accused products could potentially be discerned from this document.
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10	Exh. C (ECF 350-4)	Excerpts from the Deposition Transcript of Stephen Becker, Ph.D. taken October 29, 2020	Entirety
11			This deposition transcript was designated by SonicWall as "Confidential – Outside Counsel Eyes Only" pursuant to the Stipulated Protective Order, and from which confidential information regarding SonicWall's accused products could potentially be discerned.
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16	Exh. D (ECF 350-5)	Excerpts from the Expert Report of DeForest McDuff, Ph.D. dated September 4, 2020	Entirety
17			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.
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22	Exh. E (ECF 350-6)	Plaintiff Finjan, Inc.'s Third Supplemental Objections and Responses to Defendant SonicWall, Inc.'s First Set of Interrogatories (No. 6) dated July 31, 2020	Entirety
23			This document reflects information regarding Finjan's internal business practices and licensing negotiations, which Finjan has designated "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" under the Protective Order (ECF No. 68). Public
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			<p>disclosure of this information would cause harm to Finjan. <i>See</i> Declaration of K. Nicole Williams in Support of SonicWall’s Administrative Motion to File Under Seal (“Williams Decl.”) ¶ 7. This document also 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.</p>
<p>Exh. F (ECF 350-7)</p>	<p>Excerpts from the Supplement to Expert Report of Stephen L. Becker on Behalf of Defendant dated December 22, 2020</p>	<p>Entirety</p>	<p>This document was designated by SonicWall as “Confidential – Outside Counsel Only” pursuant to the Stipulated Protective Order. Confidential information regarding SonicWall’s accused products could potentially be discerned from this document.</p>

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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