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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FINJAN, LLC, A Delaware Limited Liability
Company,

Plaintiff,

v.

SONICWALL INC., a Delaware Corporation,

Defendant.

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

**SONICWALL INC.'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS UNDER
SEAL**

1 **I. INTRODUCTION**

2 Pursuant to Civil L.R. 7-11 and 79-5, this Court's Standing Civil Order Re: Civil Cases, the
 3 Parties Stipulated Protective Order (Dkt. 68) and Federal Rule of Civil Procedure 26(b)(5)(B),
 4 Defendant SonicWall Inc. ("SonicWall") hereby moves the Court for leave to file under seal,
 5 pursuant to Civil L.R. 79-5(d)-(e), the items identified in the table below:

Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
	SonicWall's Motion to Exclude Improper Expert Testimony Based on Finjan's Willfulness Allegations (Motion in Limine No. 1)	Highlighted portions at: Pg. 1 at lines 8-19 and 24-25; Pg. 2 at lines 1-3, 7-9 and 18-20; Pg. 3 at lines 5-6	The highlighted portions of this document reflect information that SonicWall has designated as "Highly Confidential – Attorneys' Eyes Only" or "Highly Confidential – Attorney's Eyes Only – Source Code" pursuant to the Stipulated Protective Order. If filed publicly, this confidential information could be used to SonicWall's disadvantage by competitors as it concerns the identification, organization, and or operation of SonicWall's proprietary products as well as SonicWall's confidential business information. <i>See</i> Declaration of Nicole E. Grigg in Support of Administrative Motion to File Documents Under Seal ("Grigg Declaration"), ¶¶ 2-5.
	SonicWall's Motion in Limine to Exclude Dr. McDuff's Method No. 1 (Motion in Limine No. 2)	Highlighted portions at: Pg. 1 at lines 2-5, 11, 16-17, 21 and 25; Pg. 2 at lines 6-7, 13 and 21; Pg. 3 at lines 24 and 26-27; Pg. 4 at lines 2-3, 5, 10-12, 14, 19, 22-24 and 26-28; Pg. 5 at lines 2, 6-7, 11-12 and 18-20,	The highlighted portions of this document reflect information that SonicWall has designated as "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Protective Order. If filed publicly, this confidential information could be used to SonicWall's disadvantage by competitors as it concerns SonicWall's confidential business information. Additionally, highlighted portions of this document reflect information that Finjan has designated as "Highly-Confidential – Attorneys' Eyes Only" pursuant to the Protective Order. <i>See</i> Declaration of Nicole E. Grigg in Support of Administrative Motion to File Documents Under

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	SonicWall's Motion to Exclude Dr. Striegel's Technical Apportionment Opinions and Dr. McDuff's Reliance Thereon (Motion in Limine No. 3)	Pg. 1 at lines 4 and 10-11; Pg. 5 at line 18	Seal ("Grigg Declaration"), ¶¶ 2-5. The highlighted portions of this document reflect information that SonicWall has designated as "Highly Confidential – Attorneys' Eyes Only" or "Highly Confidential – Attorney's Eyes Only – Source Code" pursuant to the Stipulated Protective Order. If filed publicly, this confidential information could be used to SonicWall's disadvantage by competitors as it concerns the identification, organization, and or operation of SonicWall's proprietary products. Additionally, highlighted portions of this document reflect information that Finjan has designated as "Highly-Confidential – Attorneys' Eyes Only" pursuant to the Protective Order. <i>See</i> Declaration of Nicole E. Grigg in Support of Administrative Motion to File Documents Under Seal ("Grigg Declaration"), ¶¶ 2-5.
	SonicWall's Motion in Limine to Exclude the Testimony of Dr. McDuff's Price Per Scan Opinions (Method No. 3) (Motion in Limine No. 4)	Pg. 1 at lines 16-21 and 23-28; Pg. 2 at lines 1-3, 6-7, 15 and 17-20; Pg. 3 at lines 3-4, 6-10, 14-15 and 18; Pg. 4 at lines 7-9 and 11; Pg. 5 at line 7	The highlighted portions of this document reflect information that SonicWall has designated as "Highly Confidential – Attorneys' Eyes Only" or "Highly Confidential – Attorney's Eyes Only – Source Code" pursuant to the Stipulated Protective Order. If filed publicly, this confidential information could be used to SonicWall's disadvantage by competitors as it concerns the identification, organization, and or operation of SonicWall's proprietary products as well as SonicWall's confidential business information. <i>See</i> Declaration of Nicole E. Grigg in Support of Administrative Motion to File Documents Under Seal ("Grigg Declaration"), ¶¶ 2-5.
1 to Gunther Declaration	Excerpts from the September 4, 2020 Expert Report of DeForest McDuff, Ph.D.	Entirety	This document contains information that SonicWall has designated as "Highly Confidential – Attorneys' Eyes Only" or "Highly Confidential – Attorneys' Eyes Only - Source Code" pursuant to the Stipulated

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			Protective Order. If filed publicly, this confidential information could be used to SonicWall's disadvantage by competitors as it concerns the identification, organization, and or operation of SonicWall's proprietary products as well as SonicWall's confidential business information. <i>See</i> Grigg Declaration, ¶¶ 2-5.
3 to Gunther Declaration	Excerpts from the September 3, 2020 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; and 8,677,494	Entirety	This document contains 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. If filed publicly, this confidential information could be used to SonicWall's disadvantage by competitors as it concerns the identification, organization, and or operation of SonicWall's proprietary products, including its source code. <i>See</i> Grigg Declaration, ¶¶ 2-5.
4 to Gunther Declaration	Excerpts from the September 3, 2020 Expert Report of Michael Mitzenmacher, Ph.D. Regarding Infringement by SonicWall, Inc. of Patent Nos. 6,804,780; 6,965,968; and 7,613,926	Entirety	This document contains 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. If filed publicly, this confidential information could be used to SonicWall's disadvantage by competitors as it concerns the identification, organization, and or operation of SonicWall's proprietary products, including its source code. <i>See</i> Grigg Declaration, ¶¶ 2-5.
5 to Gunther Declaration	Excerpts from the September 3, 2020 Expert Report of Dr. Nenad Medvidović Regarding Infringement by SonicWall, Inc. of Patent Nos. 8,225,408; 7,975,305; and 8,141,154	Entirety	This document contains 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. If filed publicly, this confidential information could be used to SonicWall's disadvantage by competitors as it

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			concerns the identification, organization, and or operation of SonicWall's proprietary products, including its source code. <i>See</i> Grigg Declaration, ¶¶ 2-5.
6 to Gunther Declaration	Excerpts from the September 3, 2020 Expert Report of Dr. Aaron Striegel	Entirety	This document contains 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. If filed publicly, this confidential information could be used to SonicWall's disadvantage by competitors as it concerns the identification, organization, and or operation of SonicWall's proprietary products as well as SonicWall's confidential business information. <i>See</i> Grigg Declaration, ¶¶ 2-5.
7 to Gunther Declaration	Excerpts from the October 22, 2020 deposition transcript of Eric Cole	Entirety	This document contains testimony that SonicWall has designated as "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Protective Order. If filed publicly, this confidential information could be used to SonicWall's disadvantage by competitors as it concerns the identification, organization, and or operation of SonicWall's proprietary products, as well as confidential business information of SonicWall. <i>See</i> Grigg Declaration, ¶¶ 2-5.
8 to Gunther Declaration	Excerpts from the October 26, 2020 deposition transcript of Michael Mitzenmacher	Entirety	This document contains testimony that SonicWall has designated as "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Protective Order. If filed publicly, this confidential information could be used to SonicWall's disadvantage by competitors as it concerns the identification, organization, and or operation of SonicWall's proprietary products, as well as confidential business and financial information of SonicWall. <i>See</i> Grigg Declaration, ¶¶ 2-5.

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