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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

**DECLARATION OF NICOLE E. GRIGG
IN SUPPORT OF SONICWALL INC.'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

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

2 1. I am an associate attorney at the law firm of Duane Morris LLP and am counsel for
3 Defendant 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 SonicWall’s Administrative Motion to File Documents Under
6 Seal pursuant to Civil L.R. 79-5(e). In making this Declaration, it is not my intention, nor the
7 intention of SonicWall, to waive the attorney-client privilege, the attorney work-product immunity,
8 or any other applicable privilege.

9 2. I have reviewed the following documents and confirmed that they consist of or quote
10 directly from documents which either were designated under the Stipulated Protective Order by
11 SonicWall or Finjan or contain information that SonicWall or Finjan or third party Francisco Partners
12 designated as “CONFIDENTIAL” “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY”
13 or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY – SOURCE CODE” pursuant to
14 the Stipulated Protective Order in this litigation.

15 3. Documents to be filed under seal:

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

Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
			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 Seal (“Grigg Declaration”), ¶¶ 2-5.
	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	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)	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;	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

Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
	(Motion in Limine No. 4)	Pg. 4 at lines 7-9 and 11; Pg. 5 at line 7	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 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.	Entirety	This document contains information that SonicWall has designated as "Highly Confidential – Attorneys' Eyes Only" or "Highly Confidential – Attorneys' Eyes Only - Source Code"

Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
	Regarding Infringement by SonicWall, Inc. of Patent Nos. 6,804,780; 6,965,968; and 7,613,926		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 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

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