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13 Attorneys for Plaintiff  
14 FINJAN LLC

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

18 FINJAN LLC., a Delaware Limited Liability  
19 Company,

20 Plaintiff,

21 v.

22 SONICWALL, INC., a Delaware Corporation,

23 Defendant.  
24

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

**FINJAN LLC'S OMNIBUS  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL ITS MOTION IN LIMINE  
NOS. 1-3 AND EXHIBITS**

Date: March 18, 2021  
Time: 1:30 PM  
Hon. Beth Labson Freeman  
Ctrm: 3, 5<sup>th</sup> Floor

1 **I. INTRODUCTION**

2 Plaintiff Finjan LLC (“Finjan”), having reviewed and complied with Civil Local Rule 79-  
3 5, hereby moves the Court for permission to file under seal the following documents:

ECF or Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
ECF 369	Finjan LLC’s Motion <i>in Limine</i> No. 1 To Preclude Testimony On Written Description from SonicWall’s Technical Experts	Highlighted portions at page 2, lines 1-2, 14-17, 19-20; page 3, lines 3-4	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. 1	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 dated September 4, 2020	Entirety	This document reflects information SonicWall has designated “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order.
Exh. 2	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.
Exh. 3	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.
Exh. 4	Excerpt from the Deposition Transcript of Avi Rubin, Ph.D.	Entirety	This deposition transcript was designated by SonicWall as “Highly

1			the Stipulated Protective Order.
2	Exh. 6	Excerpt from the Deposition Transcript of Patrick McDaniel, Ph.D. taken October 23, 2020	Entirety
3			This deposition transcript was designated by SonicWall as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order.
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5	ECF 370	Finjan LLC’s Motion <i>in Limine</i> No. 2 To Preclude Certain Damages Testimony By Dr. Becker	Highlighted portions at page 2, lines 11-12
6			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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11	Exh. 7	Excerpts from the Expert Report of Stephen L. Becker, Ph.D. on Behalf of Defendant dated October 9, 2020	Entirety
12			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 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.
13			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
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1	Exh. 8	Excerpts from the Errata to Expert Report of Stephen L. Becker, Ph.D. on Behalf of Defendant dated October 28, 2020	Entirety	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 disclosure of this information would cause harm to Finjan. <i>See</i> 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.
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14	Exh. 9	Excerpts from the Deposition Transcript of Stephen Becker, Ph.D. taken October 29, 2020	Entirety	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. 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 disclosure of this information would cause
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1			Williams Decl. ¶ 7.
2	Exh. 10	Excerpts from the Expert Report of DeForest McDuff, Ph.D. dated September 4, 2020	Entirety
3			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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7	Exh. 11	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
8			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 disclosure of this information would cause harm to Finjan. <i>See</i> 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.
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20	Exh. 12	Excerpts from the Supplement to Expert Report of Stephen L. Becker on Behalf of Defendant dated December 22, 2020	Entirety
21			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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