1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 (SAN JOSE DIVISION) 11 12 FINJAN LLC, a Delaware Limited Liability Case No. 5:17-cv-04467-BLF (VKD) Company, 13 [PROPOSED] ORDER GRANTING Plaintiff, FINJAN LLC'S ADMINISTRATIVE 14 MOTION TO FILE UNDER SEAL ITS 15 v. **MOTION IN LIMINE NOS. 1-3 AND EXHIBITS** 16 SONICWALL, INC., a Delaware Corporation, 17 Defendant. 18 DATE: March 18, 2021 19 TIME: 1:30 PM JUDGE: Hon. Beth Labson Freeman 20 Ctrm: 3, 5th Floor PLACE: 21 Plaintiff Finjan LLC's ("Finjan") Administrative Motion to File Documents Under Seal 22 came before this Court on March 4, 2021. Upon consideration of this motion and the declaration 23 24 of K. Nicole Williams filed in support thereof, the Court finds good cause for granting the request 25 to file the documents described below under seal. 26 1. There exists overriding confidentiality interests that overcome the right of public



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access to the record for the following documents:

1 2	ECF or	Document	Portion(s) to Seal	Reason(s) for Sealing
2	Exh. No.			-
3	ECF 369	Finjan LLC's Motion	Highlighted portions	The highlighted portions of
4		in Limine No. 1 To	at page 2, lines 1-2,	this document reflect information SonicWall has
5		Preclude Testimony On Written	14-17, 19-20; page 3, lines 3-4	designated "Highly
6		Description from SonicWall's Technical		Confidential – Attorneys' Eyes Only" pursuant to the
		Experts		Stipulated Protective Order
7				(ECF No. 68), and from
8				which confidential information regarding
9				SonicWall's accused products could potentially
10				be discerned.
11	Exh. 1 to the	Excerpts from the Expert Report of Dr.	Entirety	This document reflects information SonicWall has
10	Declaration	Avi Rubin Regarding		designated "Highly
12	of	Invalidity of U.S.		Confidential – Attorneys'
13	Proshanto	Patent No. 8,225,408,		Eyes Only" pursuant to the
	Mukherji	U.S. Patent No.		Stipulated Protective Order.
14	("Mukherji	7,975,305, U.S. Patent		
15	Decl.")	No. 7,613,926 and		
13		U.S. Patent No.		
16		6,965,968 dated		
1.7	7.1.2	September 4, 2020	-	
17	Exh. 2	Excerpts from the	Entirety	This document was
18		Expert Report of Dr. Kevin Almeroth on		designated by SonicWall as "Highly Confidential –
		Invalidity of U.S.		Attorneys' Eyes Only"
19		Patent Nos. 6,154,844		pursuant to the Stipulated
20		and 8,141,154 dated		Protective Order.
20		September 4, 2020		
21	Exh. 3	Excerpts from the	Entirety	This document was
22		Expert Report of Dr.		designated by SonicWall as
22		Patrick McDaniel		"Highly Confidential –
23		Regarding the		Attorneys' Eyes Only"
		Invalidity of the '494		pursuant to the Stipulated
24		and '780 Patents dated		Protective Order.
25	F1. 4	September 4, 2020	Entimeter	This deposition to the
23	Exh. 4	Excerpt from the	Entirety	This deposition transcript
26		Deposition Transcript		was designated by



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of Avi Rubin, Ph.D.

taken October 29,

2020

SonicWall as "Highly

Confidential" pursuant to

the Stipulated Protective

			Order.
Exh. 6	Excerpt from the Deposition Transcript of Patrick McDaniel, Ph.D. taken October	Entirety	This deposition transcript was designated by SonicWall as "Highly Confidential – Attorneys'
	23, 2020		Eyes Only" pursuant to the Stipulated Protective Order.
ECF 370	Finjan LLC's Motion in Limine No. 2 To	Highlighted portions at page 2, lines 11-12	The highlighted portions of this document reflect
	Preclude Certain Damages Testimony		information SonicWall has designated "Highly
	By Dr. Becker		Confidential – Attorneys' Eyes Only" pursuant to the
			Stipulated Protective Order, and from which
			confidential information regarding SonicWall's
			accused products could potentially be discerned.
Exh. 7	Excerpts from the	Entirety	This document reflects
	Expert Report of Stephen L. Becker,		information regarding Finjan's internal business
	Ph.D. on Behalf of Defendant dated		practices and licensing negotiations, which Finjan
	October 9, 2020		has designated "HIGHLY CONFIDENTIAL –
			ATTORNEYS' EYES
			ONLY" under the Protective Order (ECF No.
			68). Public disclosure of
			this information would cause harm to Finjan. See
			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



1				potentially be discerned.
1	Exh. 8	Excerpts from the	Entirety	This document reflects
2	LAII. 0	Errata to Expert	Limity	information regarding
		Report of Stephen L.		Finjan's internal business
3		Becker, Ph.D. on		practices and licensing
4		Behalf of Defendant		negotiations, which Finjan
7		dated October 28,		has designated "HIGHLY
5		2020		CONFIDENTIAL –
				ATTORNEYS' EYES
6				ONLY" under the
7 				Protective Order (ECF No.
´				68). Public disclosure of
8				this information would
				cause harm to Finjan. See
9				Williams Decl. ¶ 7. This
10				document also reflects
				information SonicWall has
11				designated "Highly Confidential – Attorneys'
12				Eyes Only" pursuant to the
12				Stipulated Protective Order,
13				and from which
				confidential information
14				regarding SonicWall's
15				accused products could
				potentially be discerned.
16	Exh. 9	Excerpts from the	Entirety	This deposition transcript
17		Deposition Transcript		was designated by
1 /		of Stephen Becker,		SonicWall as "Confidential
18		Ph.D. taken October		- Outside Counsel Eyes
10		29, 2020		Only" pursuant to the Stipulated Protective Order,
19				and from which
20				confidential information
				regarding SonicWall's
21				accused products could
22				potentially be discerned.
				This document reflects
23				information regarding
_				Finjan's internal business
24				practices and licensing
25				negotiations, which Finjan
				has designated "HIGHLY CONFIDENTIAL –
26				ATTORNEYS' EYES
27				ONLY" under the
<i>- 1</i>				Protective Order (ECF No.
28				- (= -=



1				68). Public disclosure of
2				this information would cause harm to Finjan. See
				Williams Decl. ¶ 7.
3	Exh. 10	Excerpts from the	Entirety	This document reflects
4		Expert Report of DeForest McDuff,		information SonicWall has designated "Highly
5		Ph.D. dated September		Confidential – Attorneys'
6		4, 2020		Eyes Only" pursuant to the
				Stipulated Protective Order, and from which
7				confidential information
8				regarding SonicWall's
9				accused products could potentially be discerned.
	Exh. 11	Plaintiff Finjan, Inc.'s	Entirety	This document reflects
10		Third Supplemental		information regarding
11		Objections and Responses to		Finjan's internal business practices and licensing
12		Defendant SonicWall,		negotiations, which Finjan
13		Inc.'s First Set of		has designated "HIGHLY
		Interrogatories (No. 6) dated July 31, 2020		CONFIDENTIAL – ATTORNEYS' EYES
14				ONLY" under the
15				Protective Order (ECF No.
16				68). Public disclosure of this information would
				cause harm to Finjan. See
17				Williams Decl.¶ 7. This document also reflects
18				information SonicWall has
19				designated "Highly
20				Confidential – Attorneys' Eyes Only" pursuant to the
				Stipulated Protective Order,
21				and from which
22				confidential information regarding SonicWall's
23				accused products could
	F 1 10		To all and an arrangements of the second sec	potentially be discerned.
24	Exh. 12	Excerpts from the Supplement to Expert	Entirety	This document was designated by SonicWall as
25		Report of Stephen L.		"Confidential – Outside
26		Becker on Behalf of		Counsel Only" pursuant to
27		Defendant dated December 22, 2020		the Stipulated Protective Order. Confidential
		2000111001 22, 2020		information regarding
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