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11				
12				
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14	FINJAN LLC			
15	UNITED STATES DISTRICT COURT			
16	NORTHERN DISTRIC	CT OF CALIFORNIA		
17	(SAN JOSE	DIVISION)		
18	FINJAN LLC., a Delaware Limited Liability Company,	Case No. 5:17-cv-04467-BLF (VKD)		
19		FINJAN LLC'S OMNIBUS ADMINISTRATIVE MOTION TO FILE		
20	Plaintiff,	UNDER SEAL ITS OPPOSITIONS TO		
21	v.	SONICWALL'S MOTION <i>IN LIMINE</i> NOS. 1, 2 and 4 AND EXHIBITS		
22	SONICWALL, INC., a Delaware Corporation,	Date: March 18, 2021		
23	Defendant.	Time: 1:30 PM Hon. Beth Labson Freeman		
24		Ctrm: 3, 5 th Floor		
25				
26				
27				
28				



I. INTRODUCTION

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Plaintiff Finjan LLC ("Finjan"), having reviewed and complied with Civil Local Rule 79-

5, hereby moves the Court for permission to file under seal the following documents:

4	ECF or	Document	Portion(s) to Seal	Reason(s) for Sealing
7	Exh. No. ECF 398	Finjan LLC's	Highlighted portion at	This document reflects
5		Opposition to SonicWall's Motion in	page 4, line 13	information SonicWall has
6		Limine To Exclude		designated "Highly Confidential – Attorneys'
7		Background and Opinions (Motion <i>in</i>		Eyes Only" pursuant to the Stipulated Protective Order,
8		Limine No. 1)		and from which confidential information regarding
9				SonicWall's accused products could potentially
10				be discerned. <i>See</i> Williams Decl. ¶ 3.
11	ECF 399	Finjan LLC's Opposition to	Highlighted portions at page 1, lines 16, 18,	This document reflects information regarding
12		SonicWall's Motion <i>in Limine</i> To Exclude Dr.	20; page 2, lines 1, 10, 12-15; page 3, line 20;	Finjan's internal business practices and licensing
13		McDuff's Method No. 1 (Motion <i>in Limine</i>	page 4, lines 11, 15- 16; page 5, lines 7, 9-	negotiations, which Finjan has designated "HIGHLY
14		No. 2)	10, 15-17, 19.	CONFIDENTIAL – ATTORNEYS' EYES
15				ONLY" under the Protective Order (ECF No. 68).
16				Additionally, the highlighted portions include
17				third party confidential information regarding
18				licensing with Finjan. Public disclosure of this
19				information would cause harm to Finjan. <i>See</i>
20				Declaration of K. Nicole Williams in Support of
21				SonicWall's Administrative Motion to File Under Seal
22				("Williams Decl.") ¶ 4. This document also reflects
23				information SonicWall has
				designated "Highly Confidential – Attorneys'
24				Eyes Only" pursuant to the Stimulated Protective Order



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1				and from which confidential
1				information regarding
$_{2}$				SonicWall's accused
_				products could potentially
3				be discerned.
	ECF 393	Finjan LLC's	Highlighted portions	This document reflects
4		Opposition to	at page 1, lines 17-25;	information regarding
		SonicWall's Motion in	page 2, lines 1-4, 21-	Finjan's internal business
5		Limine To Exclude Dr.	24; page 3, lines 1-8,	practices and licensing
		McDuff's Method No.	lines, 10-15, 18; page	negotiations, which Finjan
6		3 (Motion in Limine	4, lines 1-3, 7, 20-21,	has designated "HIGHLY
		No. 4)	23-25; page 5, lines 1-	CONFIDENTIAL –
7			2, 19.	ATTORNEYS' EYES
				ONLY" under the Protective
8				Order (ECF No. 68). Public
				disclosure of this
9				information would cause
10				harm to Finjan. See
10				Williams Decl. ¶ 5. This
11				document also reflects information SonicWall has
11				designated "Highly
12				Confidential – Attorneys'
12				Eyes Only" pursuant to the
13				Stipulated Protective Order,
				and from which confidential
14				information regarding
				SonicWall's accused
15				products could potentially
				be discerned.
16	Exh. A	Excerpts from Expert	Entirety	This document reflects
		Report of DeForest		information regarding
17		McDuff, Ph.D. dated		Finjan's internal business
10		September 4, 2020		practices and licensing
18				negotiations, which Finjan
19				has designated "HIGHLY
17				CONFIDENTIAL – ATTORNEYS' EYES
20				ONLY" under the Protective
20				Order (ECF No. 68). Public
21				disclosure of this
				information would cause
22				harm to Finjan. See
				Williams Decl. ¶ 6. This
23				document also reflects
				information SonicWall has
24				designated "Highly
				Confidential – Attorneys'



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1				Eyes Only" pursuant to the
$_{2}\parallel$				Stipulated Protective Order, and from which confidential
_				information regarding
3				SonicWall's accused
				products could potentially
4	E-1 D	Exposure for 11	Entinotes	be discerned.
5	Exh. B	Excerpts from the Expert Report of Dr.	Entirety	This document reflects information SonicWall has
		Expert Report of Dr. Eric Cole Regarding		designated "Highly
6		Technology Tutorial		Confidential – Attorneys'
		and Infringement by		Eyes Only" and "Highly
7		SonicWall, Inc. of		Confidential – Attorneys'
$_{8}\parallel$		Patent Nos. 6,154,844;		Eyes Only – Source Code"
8		7,058,822; 7,647,633 and 8,677,494 dated		pursuant to the Stipulated Protective Order, and from
9		September 3, 2020		which confidential
		,		information regarding
10				SonicWall's accused
				products could potentially
11				be discerned. See Williams
12	Exh. C	Excerpts from the	Entirety	Decl. ¶ 7. This document reflects
12	EAII. C	Expert Report of	Entilety	information SonicWall has
13		Michael		designated "Highly
		Mitzenmacher, Ph.D.		Confidential – Attorneys'
14		Regarding		Eyes Only" and "Highly
15		Infringement by SonicWall, Inc. of		Confidential – Attorneys'
		Patent Nos. 6,804,780;		Eyes Only – Source Code" pursuant to the Stipulated
16		6,965,968 and		Protective Order, and from
		7,613,926 dated		which confidential
17		September 3, 2020		information regarding
10				SonicWall's accused
18				products could potentially be discerned. <i>See</i> Williams
19				Decl. ¶ 7.
·	Exh. D	Excerpts from the	Entirety	This document reflects
20		Expert Report of Dr.		information SonicWall has
_		Nenad Medvidovic		designated "Highly
21		Regarding		Confidential – Attorneys'
$_{22} \parallel$		Infringement by SonicWall, Inc. of		Eyes Only" and "Highly Confidential – Attorneys'
		Patent Nos. 8,225,408;		Eyes Only – Source Code"
23		7,975,305 and		pursuant to the Stipulated
		8,141,154 dated		Protective Order, and from
24		September 3, 2020		which confidential
				information regarding



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$_{1}\parallel$				SonicWall's accused
1				products could potentially
$_{2}\parallel$				be discerned. See Williams
-				Decl. ¶ 7.
3	Exh. E	Excerpts from the	Entirety	This deposition transcript
	EAII. E	deposition transcript of	Linencey	reflects information
4		DeForest McDuff,		regarding Finjan's internal
		Ph.D. taken November		business practices and
5		2, 2020		licensing negotiations,
				which Finjan has designated
6				"HIGHLY
				CONFIDENTIAL –
7				ATTORNEYS' EYES
				ONLY" under the Protective
8				Order (ECF No. 68). Public
				disclosure of this
9				information would cause
.				harm to Finjan. See
10				Williams Decl. ¶ 6. This
11				document also reflects
11				information SonicWall has
12				designated "Highly
12				Confidential – Attorneys'
13				Eyes Only" pursuant to the Stipulated Protective Order,
				and from which confidential
14				information regarding
î				SonicWall's accused
15				products could potentially
				be discerned.
16	Exh. F	Excerpts from Expert	Entirety	This document reflects
		Report of Dr. Aaron	•	information SonicWall has
17		Striegel dated		designated "Highly
		September 3, 2020		Confidential – Attorneys'
18				Eyes Only" pursuant to the
10				Stipulated Protective Order,
19				and from which confidential
20				information regarding
20				Sonic Wall's accused
$_{21}$				products could potentially be discerned. <i>See</i> Williams
41				Decl. ¶ 7.
22	Exh. G	Excerpts from the	Entirety	This deposition transcript
	LAII. U	deposition transcript of	Limitery	reflects information
23		Aaron Striegel, Ph.D.		SonicWall has designated
		taken November 3,		"Highly Confidential –
24		2020		Attorneys' Eyes Only"
				pursuant to the Stipulated



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