

1 Juanita R. Brooks (CA SBN 75934) brooks@fr.com  
 Roger A. Denning (CA SBN 228998) denning@fr.com  
 2 Jason W. Wolff (CA SBN 215819) wolff@fr.com  
 John-Paul Fryckman (CA 317591) fryckman@fr.com  
 3 K. Nicole Williams (CA291900) nwilliams@fr.com  
 4 FISH & RICHARDSON P.C.  
 12860 El Camino Real, Ste. 400  
 5 San Diego, CA 92130  
 Telephone: (858) 678-5070 / Fax: (858) 678-5099  
 6

7 Proshanto Mukherji (*Pro Hac Vice*) mukherji@fr.com  
 FISH & RICHARDSON P.C.  
 8 One Marina Park Drive  
 Boston, MA 02210  
 9 Phone: (617) 542-5070/ Fax: (617) 542-5906

10 Robert Courtney (CA SBN 248392) courtney@fr.com  
 FISH & RICHARDSON P.C.  
 11 3200 RBC Plaza  
 60 South Sixth Street  
 12 Minneapolis, MN 55402  
 Phone: (612) 335-5070 / Fax: (612) 288-9696

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  
 25  
 26  
 27  
 28

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

**FINJAN LLC'S OMNIBUS  
 ADMINISTRATIVE MOTION TO FILE  
 UNDER SEAL ITS OPPOSITIONS TO  
 SONICWALL'S MOTION *IN LIMINE*  
 NOS. 1, 2 and 4 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 398	Finjan LLC’s Opposition to SonicWall’s Motion <i>in Limine</i> To Exclude Background and Opinions (Motion <i>in Limine</i> No. 1)	Highlighted portion at page 4, line 13	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. <i>See Williams Decl.</i> ¶ 3.
ECF 399	Finjan LLC’s Opposition to SonicWall’s Motion <i>in Limine</i> To Exclude Dr. McDuff’s Method No. 1 (Motion <i>in Limine</i> No. 2)	Highlighted portions at page 1, lines 16, 18, 20; page 2, lines 1, 10, 12-15; page 3, line 20; page 4, lines 11, 15-16; page 5, lines 7, 9-10, 15-17, 19.	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). Additionally, the highlighted portions include third party confidential information regarding licensing with Finjan. Public disclosure of this information would cause harm to Finjan. <i>See Declaration of K. Nicole Williams in Support of SonicWall’s Administrative Motion to File Under Seal (“Williams Decl.”) ¶ 4.</i> This document also reflects information SonicWall has designated “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order

1			and from which confidential information regarding SonicWall's accused products could potentially be discerned.
2			
3			
4	ECF 393	Finjan LLC's Opposition to SonicWall's Motion <i>in Limine</i> To Exclude Dr. McDuff's Method No. 3 (Motion <i>in Limine</i> No. 4)	Highlighted portions at page 1, lines 17-25; page 2, lines 1-4, 21-24; page 3, lines 1-8, lines, 10-15, 18; page 4, lines 1-3, 7, 20-21, 23-25; page 5, lines 1-2, 19.
5			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. ¶ 5. 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.
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16	Exh. A	Excerpts from Expert Report of DeForest McDuff, Ph.D. dated September 4, 2020	Entirety
17			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. ¶ 6. This document also reflects information SonicWall has designated "Highly Confidential – Attorneys'
18			
19			
20			
21			
22			
23			
24			

1			Eyes Only” pursuant to the Stipulated Protective Order, and from which confidential information regarding SonicWall’s accused products could potentially be discerned.
2			
3			
4			
5	Exh. B	Excerpts from the 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 dated September 3, 2020	Entirety
6			This document reflects information SonicWall has designated “Highly Confidential – Attorneys’ Eyes Only” and “Highly Confidential – Attorneys’ Eyes Only – Source Code” pursuant to the Stipulated Protective Order, and from which confidential information regarding SonicWall’s accused products could potentially be discerned. <i>See Williams Decl. ¶ 7.</i>
7			
8			
9			
10			
11			
12	Exh. C	Excerpts from the 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 dated September 3, 2020	Entirety
13			This document reflects information SonicWall has designated “Highly Confidential – Attorneys’ Eyes Only” and “Highly Confidential – Attorneys’ Eyes Only – Source Code” pursuant to the Stipulated Protective Order, and from which confidential information regarding SonicWall’s accused products could potentially be discerned. <i>See Williams Decl. ¶ 7.</i>
14			
15			
16			
17			
18			
19			
20	Exh. D	Excerpts from the Expert Report of Dr. Nenad Medvidovic Regarding Infringement by SonicWall, Inc. of Patent Nos. 8,225,408; 7,975,305 and 8,141,154 dated September 3, 2020	Entirety
21			This document reflects information SonicWall has designated “Highly Confidential – Attorneys’ Eyes Only” and “Highly Confidential – Attorneys’ Eyes Only – Source Code” pursuant to the Stipulated Protective Order, and from which confidential information regarding
22			
23			
24			

1			SonicWall's accused products could potentially be discerned. <i>See</i> Williams Decl. ¶ 7.
2			
3	Exh. E	Excerpts from the deposition transcript of DeForest McDuff, Ph.D. taken November 2, 2020	Entirety
4			This deposition transcript reflects information regarding Finjan's internal business practices and licensing negotiations, which Finjan has designated "HIGHLY
5			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. ¶ 6. 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.
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16	Exh. F	Excerpts from Expert Report of Dr. Aaron Striegel dated September 3, 2020	Entirety
17			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. <i>See</i> Williams Decl. ¶ 7.
18			
19			
20			
21			
22	Exh. G	Excerpts from the deposition transcript of Aaron Striegel, Ph.D. taken November 3, 2020	Entirety
23			This deposition transcript reflects information SonicWall has designated "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated
24			

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.