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12 Attorneys for Plaintiff
13 FINJAN LLC

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

18 FINJAN LLC, a Delaware Limited Liability
Company,
19
20 Plaintiff,
21 v.
22 SONICWALL INC., a Delaware Corporation,
23 Defendant.

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

**DECLARATION OF K. NICOLE
WILLIAMS IN SUPPORT OF 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**

1 I, K. Nicole Williams, hereby declare and state as follows:

2 1. I am licensed to practice in the State of California and am a principal in the law firm
3 of Fish & Richardson P.C., counsel of record for Plaintiff Finjan LLC in the above-captioned matter.
4 I have personal knowledge of all the facts contained herein and, if called as a witness, I could and
5 would testify competently thereto.

6 2. I submit this declaration in support of Finjan LLC's Omnibus Administration Motion
7 to File Under Seal its Opposition to SonicWall's Motions *in Limine* Nos. 1, 2 and 4, and
8 accompanying Exhibits A-G, J-L, and O. All exhibits are attached to the Omnibus Declaration of
9 Robert Courtney in Support of Finjan's Oppositions to SonicWall's Motions *in Limine*. As required
10 under Civil L.R. 79-5(d)(1)(A), Civil L.R. 79-5(e), and this Court's Standing Order, the basis for
11 asserting confidentiality and the grounds for filing under seal the documents listed below are as
12 follows:

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

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			<p>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</i> Declaration of K. Nicole Williams in Support of SonicWall’s Administrative Motion to File Under Seal (“Williams Decl.”) ¶ 4. 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.</p>
ECF 393	<p>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)</p>	<p>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.</p>	<p>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</p>

1			SonicWall's accused products could potentially be discerned.
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3	Exh. A	Excerpts from Expert Report of DeForest McDuff, Ph.D. dated September 4, 2020	Entirety
4			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' 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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15	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
16			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</i> Williams Decl. ¶ 7.
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23	Exh. C	Excerpts from the Expert Report of Michael Mitzenmacher, Ph.D.	Entirety
24			This document reflects information SonicWall has designated "Highly Confidential – Attorneys'

1		Regarding Infringement by SonicWall, Inc. of Patent Nos. 6,804,780; 6,965,968 and 7,613,926 dated September 3, 2020		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>
2	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	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>
3	Exh. E	Excerpts from the deposition transcript of DeForest McDuff, Ph.D. taken November 2, 2020	Entirety	This deposition transcript 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 Williams Decl. ¶ 6.</i> This document also reflects information SonicWall has designated “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order,
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