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11				
12	Attorneys for Plaintiff			
13	FINJAN LLC			
14	UNITED STATES DISTRICT COURT			
15	NORTHERN DISTRICT OF CALIFORNIA			
16	(SAN JOSE DIVISION)			
17				
18	FINJAN LLC, a Delaware Limited Liability Company,	Case No. 5:17-cv-04467-BLF (VKD)		
19	Plaintiff,	DECLARATION OF K. NICOLE WILLIAMS IN SUPPORT OF FINJAN		
20	·	LLC'S OMNIBUS ADMINISTRATIVE		
21	V.	MOTION TO FILE UNDER SEAL ITS OPPOSITIONS TO SONICWALL'S		
22	SONICWALL INC., a Delaware Corporation,	MOTION IN LIMINE NOS. 1, 2 and 4 AND EXHIBITS		
23	Defendant.			
24		J		
25				
26				
27				
28				



- I, K. Nicole Williams, hereby declare and state as follows:
- 1. I am licensed to practice in the State of California and am a principal in the law firm of Fish & Richardson P.C., counsel of record for Plaintiff Finjan LLC in the above-captioned matter. I have personal knowledge of all the facts contained herein and, if called as a witness, I could and would testify competently thereto.
- 2. I submit this declaration in support of Finjan LLC's Omnibus Administration Motion to File Under Seal its Opposition to SonicWall's Motions *in Limine* Nos. 1, 2 and 4, and accompanying Exhibits A-G, J-L, and O. All exhibits are attached to the Omnibus Declaration of Robert Courtney in Support of Finjan's Oppositions to SonicWall's Motions *in Limine*. As required under Civil L.R. 79-5(d)(1)(A), Civil L.R. 79-5(e), and this Court's Standing Order, the basis for asserting confidentiality and the grounds for filing under seal the documents listed below are as follows:

ECF or	Document	Portion(s) to Seal	Reason(s) for Sealing
Exh. No.			
ECF 398	Finjan LLC's	Highlighted portion at	This document reflects
	Opposition to	page 4, line 13	information SonicWall has
	SonicWall's Motion in		designated "Highly
	Limine To Exclude		Confidential – Attorneys'
	Background and		Eyes Only" pursuant to the
	Opinions (Motion in		Stipulated Protective Order,
	Limine No. 1)		and from which confidential
			information regarding
			SonicWall's accused
			products could potentially
			be discerned. See Williams
			Decl. ¶ 3.
ECF 399	Finjan LLC's	Highlighted portions	This document reflects
	Opposition to	at page 1, lines 16, 18,	information regarding
	SonicWall's Motion in	20; page 2, lines 1, 10,	Finjan's internal business
	Limine To Exclude Dr.	12-15; page 3, line 20;	practices and licensing
	McDuff's Method No.	page 4, lines 11, 15-	negotiations, which Finjan
	1 (Motion in Limine	16; page 5, lines 7, 9-	has designated "HIGHLY
	No. 2)	10, 15-17, 19.	CONFIDENTIAL –
			ATTORNEYS' EYES
			ONLY" under the Protective



1				Order (ECF No. 68).
				Additionally, the
2				highlighted portions include
				third party confidential
3				information regarding
				licensing with Finjan.
4				Public disclosure of this
				information would cause
5				harm to Finjan. See
				Declaration of K. Nicole
6				Williams in Support of
				SonicWall's Administrative
7				Motion to File Under Seal
				("Williams Decl.") ¶ 4.
8				This document also reflects
				information SonicWall has
9				designated "Highly
.				Confidential – Attorneys'
10				Eyes Only" pursuant to the
,				Stipulated Protective Order, and from which confidential
11				
12				information regarding SonicWall's accused
12				products could potentially
13				be discerned.
	ECF 393	Finjan LLC's	Highlighted portions	This document reflects
14	Let 373	Opposition to	at page 1, lines 17-25;	information regarding
-		SonicWall's Motion in	page 2, lines 1-4, 21-	Finjan's internal business
15		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
16		3 (Motion in Limine	4, lines 1-3, 7, 20-21,	has designated "HIGHLY
		No. 4)	23-25; page 5, lines 1-	CONFIDENTIAL –
17		·	2, 19.	ATTORNEYS' EYES
				ONLY" under the Protective
18				Order (ECF No. 68). Public
.				disclosure of this
19				information would cause
20				harm to Finjan. See
20				Williams Decl. ¶ 5. This document also reflects
$_{21}$				information SonicWall has
<u> </u>				designated "Highly
22				Confidential – Attorneys'
				Eyes Only" pursuant to the
23				Stipulated Protective Order,
				and from which confidential
24				information regarding
		1	į	3111111111111111111111111111111111



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1				SonicWall's accused
				products could potentially
2				be discerned.
	Exh. A	Excerpts from Expert	Entirety	This document reflects
3		Report of DeForest		information regarding
		McDuff, Ph.D. dated		Finjan's internal business
4		September 4, 2020		practices and licensing
				negotiations, which Finjan
5				has designated "HIGHLY
				CONFIDENTIAL –
6				ATTORNEYS' EYES
				ONLY" under the Protective
7				Order (ECF No. 68). Public
				disclosure of this
8				information would cause
				harm to Finjan. See
9				Williams Decl. ¶ 6. This
10				document also reflects
10				information SonicWall has
11				designated "Highly
11				Confidential – Attorneys'
12				Eyes Only" pursuant to the Stipulated Protective Order,
12				and from which confidential
13				information regarding
				SonicWall's accused
14				products could potentially
-				be discerned.
15	Exh. B	Excerpts from the	Entirety	This document reflects
		Expert Report of Dr.		information SonicWall has
16		Eric Cole Regarding		designated "Highly
		Technology Tutorial		Confidential – Attorneys'
17		and Infringement by		Eyes Only" and "Highly
		SonicWall, Inc. of		Confidential – Attorneys'
18		Patent Nos. 6,154,844;		Eyes Only – Source Code"
		7,058,822; 7,647,633		pursuant to the Stipulated
19		and 8,677,494 dated		Protective Order, and from
<u> </u>		September 3, 2020		which confidential
20				information regarding
21				SonicWall's accused
21				products could potentially
22				be discerned. See Williams
22	Evb. C	Execute fuere the	Entinoty	Decl. ¶ 7. This document reflects
23	Exh. C	Excerpts from the Expert Report of	Entirety	information SonicWall has
-5		Michael		designated "Highly
24		Mitzenmacher, Ph.D.		Confidential – Attorneys'
- 1		THE CHIMACHOI, I II.D.	1	Community Tittorneys



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1		Regarding		Eyes Only" and "Highly
		Infringement by		Confidential – Attorneys'
2		SonicWall, Inc. of		Eyes Only – Source Code"
		Patent Nos. 6,804,780;		pursuant to the Stipulated
3		6,965,968 and		Protective Order, and from
		7,613,926 dated		which confidential
4		September 3, 2020		information regarding
				SonicWall's accused
5				products could potentially
				be discerned. See Williams
6				Decl. ¶ 7.
	Exh. D	Excerpts from the	Entirety	This document reflects
7		Expert Report of Dr.		information SonicWall has
		Nenad Medvidovic		designated "Highly
8		Regarding		Confidential – Attorneys'
		Infringement by		Eyes Only" and "Highly
9		SonicWall, Inc. of		Confidential – Attorneys'
		Patent Nos. 8,225,408;		Eyes Only – Source Code"
10		7,975,305 and		pursuant to the Stipulated
.		8,141,154 dated		Protective Order, and from
11		September 3, 2020		which confidential
.				information regarding
12				SonicWall's accused
12				products could potentially
13				be discerned. See Williams
14		F ( C (1	Г.,	Decl. ¶ 7.
14	Exh. E	Excerpts from the	Entirety	This deposition transcript reflects information
15		deposition transcript of DeForest McDuff,		regarding Finjan's internal
13		Ph.D. taken November		business practices and
16		2, 2020		licensing negotiations,
		2, 2020		which Finjan has designated
17				"HIGHLY
				CONFIDENTIAL –
18				ATTORNEYS' EYES
				ONLY" under the Protective
19				Order (ECF No. 68). Public
				disclosure of this
20				information would cause
				harm to Finjan. See
21				Williams Decl. ¶ 6. This
				document also reflects
22				information SonicWall has
				designated "Highly
23				Confidential – Attorneys'
				Eyes Only" pursuant to the
24				Stipulated Protective Order,
- 11				



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