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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FINJAN, LLC, A Delaware Limited Liability
Company,

Plaintiff,

v.

SONICWALL INC., a Delaware Corporation,

Defendant.

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

**SONICWALL INC.'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS UNDER
SEAL**

1 **I. INTRODUCTION**

2 Pursuant to Civil L.R. 7-11 and 79-5, this Court's Standing Civil Order Re: Civil Cases, the
 3 Parties Stipulated Protective Order (Dkt. 68) and Federal Rule of Civil Procedure 26(b)(5)(B),
 4 Defendant SonicWall Inc. ("SonicWall") hereby moves the Court for leave to file under seal,
 5 pursuant to Civil L.R. 79-5(d)-(e), the items identified in the table below:

Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
7 8 9 10 11 12 13 14 15 16 17	SonicWall's Response to Finjan's Motion in Limine No. 2 to Preclude Certain Damages Testimony by Dr. Becker	Highlighted portions at: Pg. 1 at lines 19-24; pg. 3 at lines 15-27; pg. 4 at lines 1-6, and 10-13; pg. 5 at lines 6-11	The highlighted portions of this document reflect information that SonicWall has designated as "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Protective Order. If filed publicly, this confidential information could be used to SonicWall's disadvantage by competitors as it concerns SonicWall's confidential business information. Additionally, highlighted portions of this document reflect information that Finjan has designated as "Highly-Confidential – Attorneys' Eyes Only" pursuant to the Protective Order. <i>See</i> Declaration of Nicole E. Grigg in Support of Administrative Motion to File Documents Under Seal ("Grigg Declaration"), ¶¶ 2-5.
18 19 20 21 22	SonicWall's Response to Finjan's Motion in Limine No. 4 to Preclude Evidence or Testimony Regarding Mr. Touboul's Replacement as CEO of Finjan	Highlighted portions at: Pg. 1 at lines 11-12, 14-15 and 19-24; pg. 2 at 16-17, 19-25 and 27; pg. 3 at lines 18-19 and 21	The highlighted portions of this document reflect information that Finjan has designated as "Highly-Confidential – Attorneys' Eyes Only" pursuant to the Protective Order. <i>See</i> Declaration of Nicole E. Grigg in Support of Administrative Motion to File Documents Under Seal ("Grigg Declaration"), ¶¶ 2-5.
23 24 25 26 27 28	SonicWall's Response to Finjan's Motion in Limine No. 5 to Preclude Evidence of Other Pending Proceedings Involving Finjan	Highlighted portions at: Pg. 1 at lines 27-28; Pg. 2 at lines 1-3 and 9-11	The highlighted portions of this document reflect information that Finjan has designated as "Highly-Confidential – Attorneys' Eyes Only" pursuant to the Protective Order. <i>See</i> Declaration of Nicole E. Grigg in Support of Administrative Motion to File Documents Under Seal ("Grigg Declaration"), ¶¶ 2-

Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
			5.
36 to Gunther Declaration	SonicWall's Responsive Damages Contentions Pursuant to Patent L.R. 3-9	Entire	This document contains information that Finjan has designated as "Confidential" pursuant to the Stipulated Protective Order. <i>See</i> Grigg Declaration, ¶¶ 2-5.
37 to Gunther Declaration	Excerpts from the September 4, 2020 Expert Report of DeForest McDuff, Ph.D.	Entirety	This document contains information that SonicWall has designated as "Highly Confidential – Attorneys' Eyes Only" or "Highly Confidential – Attorneys' Eyes Only - Source Code" pursuant to the Stipulated Protective Order. If filed publicly, this confidential information could be used to SonicWall's disadvantage by competitors as it concerns the identification, organization, and or operation of SonicWall's proprietary products as well as SonicWall's confidential business information. Additionally, this document contains information designated by Finjan as "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Protective Order. <i>See</i> Grigg Declaration, ¶¶ 2-5.

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Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
38 to Gunther Declaration	Excerpts from the October 9, 2020 Expert Report of Stephen L. Becker	Entirety	This document contains testimony that SonicWall has designated as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order. If filed publicly, this confidential information could be used to SonicWall’s disadvantage by competitors as it concerns the identification, organization, and or operation of SonicWall’s proprietary products, as well as confidential business and financial information of SonicWall. Additionally, this document contains information designated by Finjan as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order. See Grigg Declaration, ¶¶ 2-5.
39 to Gunther Declaration	Evidence cited in the October 9, 2020 Expert Report of Stephen L. Becker (SLB-1A and SLB-1B)	Entirety	This document contains testimony that SonicWall has designated as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order. If filed publicly, this confidential information could be used to SonicWall’s disadvantage by competitors as it concerns SonicWall’s confidential business and financial information. See Grigg Declaration, ¶¶ 2-5.

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Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
40 to Gunther Declaration	Excerpts from the August 6, 2019 deposition transcript of Shlomo Touboul, taken in the matter of <i>Finjan LLC v. Cisco Systems, Inc.</i> , Case No. 5:17-cv-00072 (N.D. Ca.) (“the <i>Cisco</i> Case”)	Entirety	This document contains testimony that Finjan has designated as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order. See Grigg Declaration, ¶¶ 2-5.
41 to Gunther Declaration	Excerpts from the November 2, 2020 deposition transcript of DeForest McDuff	Entirety	This document contains testimony that Finjan has designated as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order. See Grigg Declaration, ¶¶ 2-5.
42 to Gunther Declaration	Excerpts from the September 4, 2020 Expert Report of Dr. Avi Rubin Regarding Invalidity of U.S. Patent No. 8,225,408, U.S. Patent No. 7,975,305, U.S. Patent No. 7,613,926, And U.S. Patent No. 6,965,968	Entirety	This document contains testimony that SonicWall has designated as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order. If filed publicly, this confidential information could be used to SonicWall’s disadvantage by competitors as it concerns the identification, organization, and or operation of SonicWall’s proprietary products. See Grigg Declaration, ¶¶ 2-5.
43 to Gunther Declaration	Excerpts from the September 4, 2020 Expert Report of Dr. Kevin Almeroth on Invalidity of U.S. Patent Nos. 6,154,844 and 8,141,154	Entirety	This document contains testimony that SonicWall has designated as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Stipulated Protective Order. If filed publicly, this confidential information could be used to SonicWall’s disadvantage by competitors as it concerns the identification, organization, and or operation of SonicWall’s proprietary products. See Grigg Declaration, ¶¶ 2-5.

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