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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

**DECLARATION OF NICOLE E. GRIGG  
IN SUPPORT OF SONICWALL INC.'S  
ADMINISTRATIVE MOTION TO FILE  
DOCUMENTS UNDER SEAL**

1 I, Nicole E. Grigg, declare as follows:

2 1. I am an associate attorney at the law firm of Duane Morris LLP and am counsel for  
3 Defendant SonicWall, Inc. (“SonicWall”). I have personal knowledge of the matters set forth in this  
4 Declaration, and if called as a witness, could and would testify competently to such facts under oath.  
5 I submit this Declaration in support of SonicWall’s Administrative Motion to File Documents Under  
6 Seal pursuant to Civil L.R. 79-5(e). In making this Declaration, it is not my intention, nor the  
7 intention of SonicWall, to waive the attorney-client privilege, the attorney work-product immunity,  
8 or any other applicable privilege.

9 2. I have reviewed the following documents and confirmed that they consist of or quote  
10 directly from documents which either were designated under the Stipulated Protective Order by  
11 SonicWall or Finjan or contain information that SonicWall or Finjan designated as  
12 “CONFIDENTIAL” “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” or “HIGHLY  
13 CONFIDENTIAL – ATTORNEYS’ EYES ONLY – SOURCE CODE” pursuant to the Stipulated  
14 Protective Order in this litigation or the Stipulated Protective Order in the *Cisco* case (*Finjan LLC v.*  
15 *Cisco Systems, Inc.*, Case No. 5:17-cv-00072 (N.D. Ca.)) (“the *Cisco* case”).

16 3. Documents to be filed under seal:

Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
	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

Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
			Seal (“Grigg Declaration”), ¶¶ 2-5.
	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.
	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”), ¶¶ 2-5.
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.

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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