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11 **UNITED STATES DISTRICT COURT**
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 FINJAN, INC.,

14 Plaintiff,

15 v.

16 ESET, LLC, et al.,

17 Defendants.

Case No. 3:17-cv-0183-CAB-BGS

**MOTION FOR REDACTION OF THE
MARCH 2020 TRIAL TRANSCRIPTS
AND TO SEAL CERTAIN TRIAL
EXHIBITS**

Judge: Hon. Cathy Ann Bencivengo

19 AND RELATED COUNTERCLAIMS.
20

1 Defendants and Counter-Plaintiffs ESET, LLC and ESET, spol. s.r.o. (collectively,
 2 “ESET”), through their undersigned counsel, hereby request, pursuant to the procedures
 3 set forth in the Electronic Availability of Transcripts of Proceedings Before U.S. District
 4 and Magistrate Judges, that certain limited portions of the trial transcripts for March 11,
 5 2020 and March 12, 2020 (D.I. 793-794) in this matter be redacted as well as certain
 6 exhibits filed as part of the trial.¹

7 Specifically, ESET requests that the following information be redacted from the
 8 trial transcripts:²

9
 10 Trial Transcript Day 2 – March 11, 2020 (D.I. 793)

11	Start	End	Words to Redact
12	286:10	286:10	Start of line until the question mark
13	286:17	286:18	The words between “are” and the “.” at the end of the sentence
14	337:14	337:14	Third word on the line
15	337:16	337:16	The words between “calling” and “on”
16	337:18	337:19	Starting with the last word on line 18 and ending with the word
17			before “and” on line 19
18	338:12	338:13	The words between “118” and the “.”
19	338:15	338:15	Starting with the first word on the line and ending with the second
20			to last word on the line
21	338:16	338:17	The words between “have” and the “.” at the end of the sentence
22	338:17	338:18	The words between “again” and the “.” at the end of the sentence
23	339:13	339:13	From the beginning of the line to the word before “which”
24	339:15	339:16	The words between “the” and “together”
25	340:3	340:4	The words between “have the” and “that”

26
 27 ¹ Defendants do not request any redactions to the Master Index or to the Trial Transcript
 28 for Day 1. (D.I. 791-792).

² Should the Court find it helpful, a highlighted version of the transcripts identifying the

	Start	End	Words to Redact
1			
2	340:5	340:5	The first word on the line
3	340:15	340:15	Between the word “are” and the “.” at the end of the sentence
4	340:19	340:20	Between the words “showing that” and ending at the “.” at the end
5			of the sentence
6	342:15	342:18	Entirety of these lines
7	346:1	346:5	Between the words “a” on line 1 and “which” on line 5
8	347:3	347:4	Between the words “and it’s” and “what was detected”
9	347:5	347:6	Between the word “generates” and the “.” at the end of the
10			sentence
11	347:6	347:7	Between the word “it’s” and the “.” at the end of the sentence
12	356:10	356:13	Between the word “it” on line 10 and the word “and” on line 13.
13	356:18	356:18	Between the word “called” and the “.” at the end of the sentence
14	361:9	361:16	Between the words “ESET has” on line 9 and “which” on line 16
15	362:6	362:6	Between the word “a” and the “?” at the end of the sentence
16	362:8	362:9	Between the word “a” and the “.” at the end of the sentence
17	362:16	362:17	Starting with the first word on the line 16 and ending before the
18			word “and” on line 17
19	364:17	364:17	Between the word “downloadables” and the “.” at the end of the
20			sentence
21	368:6	368:7	The entirety of these lines
22	368:10	368:10	Between the words “130” and “v9”
23	368:17	368:18	Between the words “set” and “v15”
24	368:25	369:1	Between the words “for the” and “which”
25	369:3	369:3	Between the words “about” and “service”
26	369:18	369:21	Starting with the first word on line 18 and ending before the word
27			“which” on line 21
28			

Start	End	Words to Redact
370:2	370:2	Between the word “271” and the “.” at the end of the sentence
370:3	370:4	Between the words “new entry” and the “.” at the end of the sentence
370:4	370:12	Starting after the word “is” on line 4 and continuing to the end of the paragraph.
371:25	371:25	Between the words “by” and “and”
372:5	372:6	Starting with the first word on line 5 and ending before the word “and” on line 6
372:8	372:9	Between the words “and” and “to”
373:25	373:25	The first two words on the line
374:3	374:3	Between the words “be” and “from”
374:5	374:8	Between the word “so” on line 5 and the end of line 8
375:10	375:14	Between the words “are” on line 10 and “would” on line 14
376:8	376:8	Starting at the beginning of the line and ending before the word “contains”
376:21	377:6	Between the words “System” on line 21 and “which” on line 6
378:1	378:2	Between the word “your” and the “.” at the end of the sentence

Trial Transcript Day 3 – March 12, 2020 (D.I. 794)

Start	End	Words to Redact
421:5	421:6	Between the words “example” and “if”
421:18	421:19	Between the words “in” and “if”
423:9	423:10	Between the words “including” and “it”
423:15	424:16	Between the words “the” and “via”
448:25	449:1	Between the words “called” and “right”
449:3	449:3	Between the words “just” and “and”

	Start	End	Words to Redact
1			
2	449:5	449:5	From the start of the line until the word before “are”
3	455:3	455:3	Between the word “that” and the “?” at the end of the sentence
4	455:16	455:17	Between the word “not” and the “?” at the end of the sentence
5	455:18	455:18	Between the words “the” and “on”
6	455:20	455:21	The entirety of both lines
7	456:1	456:2	Between the word “it’s” and the “.” at the end of the sentence
8	515:2	515:3	Between the words “interesting” and “Can”
9	519:16	519:21	Starting after the word “sees” on line 16 and ending at the end of
10			line 21
11	519:24	519:24	Between the words “words like” and “and”
12	520:2	520:2	Between the word “as” and the “.” at the end of the sentence
13	520:6	520:7	Between the words “file” and “so”
14	520:9	520:10	Between the word “okay” and the “.” at the end of the sentence
15	520:14	520:14	Between the words “at” and “that”
16	520:15	520:15	Between the words “here” and “and”
17	520:16	520:17	Between the word “these” and the “.” at the end of the sentence
18	520:19	520:20	Between the words “at” and “That’s”
19	520:20	520:22	Between the words “the” and “and so on”
20	520:24	520:25	Between the word “does” and “right”
21	521:2	521:2	Between the words “complicated” and “But”
22	521:3	521:7	Between the word “a” on line 3 and the end of line 7
23	521:9	521:10	Between the words “as” and “right”
24	521:11	521:13	Starting with the first word on line 11 and ending before the word
25			“looks”
26	522:6	522:7	Between the words “1” and “those”
27	522:9	522:9	Between the words “this” and “that”
28			

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