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ESET, LLC and ESET, SPOL. S.R.O.

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

FINJAN, INC.,

Plaintiff,

v.

ESET, LLC, et al.,

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

AND RELATED COUNTERCLAIMS.

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

Specifically, ESET requests that the following information be redacted from the trial transcripts:<sup>2</sup>

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

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

<sup>1</sup> Defendants do not request any redactions to the Master Index or to the Trial Transcript for Day 1. (D.I. 791-792).

<sup>2</sup> Should the Court find it helpful, a highlighted version of the transcripts identifying the

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

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



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