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Plaintiffs

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

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

14 FINJAN LLC,

15 Plaintiff,

16 v.

17 ESET, LLC, et al.,

18 Defendants.

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

**MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

*[Filed concurrently with Joint Statement
Regarding Briefing Order (D.I. 841)]*

Judge: Hon. Bernard G. Skomal

19
20 AND RELATED COUNTERCLAIMS.
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1 Defendants and Counter-Plaintiffs ESET, LLC and ESET spol. s.r.o. (collectively
2 referred to as “ESET”), hereby request leave to file documents under seal pursuant to
3 Federal Rule of Civil Procedure 26(c), Civil Local Rule 79.2, Patent Rule 2.2, Judge
4 Skomal’s Chambers Rules, and the Modified Protective Order (Dkt No. 146-4).

5 ESET requests leave to file the following document under seal:

- 6 1. Joint Statement Regarding Briefing Order (D.I. 841)
- 7 2. Exhibits E and G to the Declaration of Regis C. Worley, Jr. in Support of the
8 Joint Statement Regarding Briefing Order (D.I. 841).

9 ESET requests the Court’s permission to file the documents above under seal
10 because they contain materials designated by Finjan LLC as “HIGHLY
11 CONFIDENTIAL –ATTORNEYS’ EYES ONLY” under the Modified Protective Order
12 (Dkt. 146-4). In order to protect information designated by Finjan as confidential, ESET
13 requests an order allowing the documents to be filed under seal. ESET has redacted the
14 bare minimum of information.

15 Pursuant to the Civil Local Rule 79.2, Patent Rule 2.2 and Magistrate Judge
16 Skomal’s Chambers Rules, ESET has filed publicly the relevant excerpts of information
17 that are not confidential.

18 ESET separately and concurrently submits a proposed order to the Court in
19 accordance with Civ. L. R. 79.2 and Section 2(h) of the Electronic Case Filing and
20 Administrative Policies and Procedures Manual.

1 Dated: January 6, 2021

Respectfully submitted,

EVERSHEDS SUTHERLAND (US) LLP

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