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APPLIED MATERIALS, INC.

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14
15 APPLIED MATERIALS, INC.,
16 Plaintiff,
17 vs.
18 DEMARAY LLC,
19 Defendant.

CASE NO. 5:20-cv-05676-EJD

**APPLIED MATERIALS INC.'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL**

1 Applied Materials Inc. (“Applied”) through counsel, and pursuant to Local Rules 7-11 and
2 79-5, hereby moves for leave to file under seal selected portions of Applied’s Reply in Support of
3 Motion for Preliminary Injunction to Enjoin Demaray LLC from Proceeding with Customer Suits
4 During the Pendency of this Action (the “Reply”) and documents in support thereof containing
5 confidential employee and business information relating to Applied, Samsung Electronics
6 America, Inc., Samsung Electronics Co., Ltd, Samsung Semiconductor, Inc., and Samsung Austin
7 Semiconductor, LLC (collectively “Samsung”), and Intel Corporation (“Intel”).

8 Specifically, Applied seeks leave to file the following under seal:

- 9 • Exhibit N to the Supplemental Declaration of Boris Lubarsky in Support of
10 Applied’s Reply (“Mr. Narashiman’s Employee Agreement”);
- 11 • Portions of the Declaration of Ryan Greuter in Support of Applied’s Reply;
- 12 • Portions of the Declaration of Do Hyung Kim in Support of Applied’s Reply;
- 13 • Portions of the Declaration of Thomas Herrgott in Support of Applied’s Reply;
- 14 • Portions of the Declaration of Keith Miller in Support of Applied’s Reply
15 (collectively, “Supporting Declarations”); and
- 16 • Portions of Applied’s Reply that refer to the aforementioned documents.

17 In support of this Motion, Applied states:

- 18 1. No protective order has yet issued in this action.
- 19 2. Mr. Narashiman’s Employee Agreement, and the portions of the Reply that cite it,
20 contain sensitive employee information and will be designated confidential by
21 Applied once a protective order has issued in this action.
- 22 3. The Supporting Declarations, and the portions of the Reply that cite them, contain
23 sensitive business information related to proprietary technology of Applied,
24 Samsung, and Intel, and will be designated confidential once a protective order has
25 issued in this action.
- 26 4. Applied is filing herewith the Declaration of Boris Lubarsky in Support of
27 Applied’s Administrative Motion to File Under Seal and a Proposed Order.
- 28

1 WHEREFORE, Applied respectfully requests that this Court grant it leave to file the
2 limited selections of its Reply and documents in support, identified above, under seal as set forth
3 herein.

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5 DATED: October 9, 2020

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By: /s/ Yar R. Chaikovsky
YAR R. CHAIKOVSKY

Attorneys for Plaintiff
APPLIED MATERIALS