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Attorneys for Plaintiff
APPLIED MATERIALS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

APPLIED MATERIALS, INC.,

Plaintiff,

vs.

DEMARAY LLC,

Defendant.

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

**DECLARATION OF BORIS
LUBARSKY IN SUPPORT OF
APPLIED MATERIALS
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL**

LUBARSKY DECL. IN SUPPORT

1 I, Boris Lubarsky, hereby declare as follows:

2 1. I am an associate with the law firm Paul Hastings LLP, counsel for the Plaintiff Applied
3 Materials, Inc. (“Applied”). I have personal knowledge of the facts contained in the declaration
4 and, if called upon to do so, I could and would testify competently to the matters set forth herein.

5 2. I submit this declaration in support of Applied’s Administrative Motion for Leave to File
6 under Seal selected portions of Applied’s Reply in Support of Motion for Preliminary Injunction
7 to Enjoin Demaray LLC from Proceeding with Customer Suits During the Pendency of this
8 Action (the “Reply”) and documents in support thereof containing confidential employee and
9 business information relating to Applied, Samsung Electronics America, Inc., Samsung
10 Electronics Co., Ltd, Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, LLC
11 (collectively “Samsung”), and Intel Corporation (“Intel”).

12 3. Exhibit N to the Supplemental Declaration of Boris Lubarsky in Support of Applied’s
13 Reply (“Mr. Narashiman’s Employee Agreement”), and the portions of the Reply that cite it,
14 contain sensitive employee information and will be designated confidential by Applied once a
15 protective order has issued in this action.

16 4. The declarations submitted by Intel, Samsung, and Applied, and the portions of the Reply
17 that cite them, contain sensitive business information related to proprietary technology of
18 Applied, Samsung, and Intel, and will be designated confidential once a protective order has
19 issued in this action.

20 I declare under penalty of perjury that the foregoing is true and correct.

21 DATED: October 9, 2020

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23 By: /s/ Boris Lubarsky

24 Boris Lubarsky
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LUBARSKY DECL IN SUPPORT