1	YAR R. CHAIKOVSKY (SB# 175421) yarchaikovsky@paulhastings.com	
2	PHILIP OU (SB# 259896) philipou@paulhastings.com	
3	ANDY LEGOLVAN (SB# 292520) andylegolvan@paulhastings.com	
4	JOŠEPH J. RUMPLER, II (SB# 296941) josephrumpler@paulhastings.com	
5	BERKELEY FIFE (SB# 325293) berkeleyfife@paulhastings.com	
6	BORIS LUBARSKY (SB# 324896) borislubarsky@paulhastings.com	
7	PAUL HASŤINGS LLP 1117 S. California Avenue	
8	Palo Alto, California 94304-1106 Telephone: 1(650) 320-1800	
9	Facsimile: 1(650) 320-1900	
10	Attorneys for Plaintiff APPLIED MATERIALS, INC.	
11		
12	UNITED STATES DISTRICT COURT	
13	NORTHERN DISTRI	CT OF CALIFORNIA
14		
15	APPLIED MATERIALS, INC.,	CASE NO. 5:20-cv-05676-EJD
16	Plaintiff,	SUPPLEMENTAL DECLARATION OF BORIS LUBARSKY IN SUPPORT OF
17	vs.	APPLIED MATERIALS, REPLY MOTION FOR PRELIMINARY
18	DEMARAY LLC,	INJUNCTION
19	Defendant.	
20		
21		
22		
23		
24		
25		
26		
27		
28		
	l .	SUPP LUBARSKY DECL IN SUPPORT OF



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. Attached as <b>Exhibit K</b> is a true and correct copy of an August 21, 2015 email from	
6	Earnest Demaray to Chris Talbot at Applied.	
7	3. Attached as <b>Exhibit L</b> is a true and correct copy of a printout of Vault.com's website,	
8	which I obtained on October 9, 2020, from the following URL: <a href="https://www.vault.com/company-">https://www.vault.com/company-</a>	
9	profiles/manufacturing/applied-	
10	materials#:~:text=Applied's%20biggest%20customers%20for%20chip,at%20least%2010%25%2	
11	0of%20revenue.&text=Applied%20Materials%20has%20manufactured%20strong,past%20years	
12	<u>%20except%20in%202019</u> .	
13	4. Attached as <b>Exhibit M</b> is a true and correct copy of a printout of Investors.com's article,	
14	which I obtained on October 9, 2020, from the following URL:	
15	https://www.investors.com/news/technology/applied-materials-buys-japanese-company-for-more-	
16	than-two-billion/.	
17	5. Attached as <b>Exhibit N</b> is a true and correct copy of the Employee Agreement of	
18	Mukundan Narasimhan dated October 15, 1997, which is being filed under seal.	
19		
20	I declare under penalty of perjury that the foregoing is true and correct.	
21	DATED: October 9, 2020	
22		
23	By: <u>/s/ Boris Lubarsky</u>	
24	Boris Lubarsky	
25		
26		
27		
30 l		



SUPP LUBARSKY DECL IN SUPPORT OF