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10 Attorneys for Plaintiff
 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

**DECLARATION OF *Ryan Greater* IN
 SUPPORT OF APPLIED MATERIALS,
 INC.'S REPLY IN SUPPORT OF
 MOTION FOR PRELIMINARY
 INJUNCTION**

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Ryan

1 I, Ryan Greuter, hereby declare:

2 1. I am an employee of Samsung Austin Semiconductor, LLC and have been since January
3 of 2001. I am currently the Senior Director of CVD/Metals Engineering, and was previously the
4 Senior Director of Etch Engineering.

5 2. I submit this declaration in support of Applied Materials, Inc.'s ("Applied") Reply in
6 support of its motion for preliminary injunction.

7 3. Unless indicated otherwise, I have personal knowledge of the facts contained in this
8 declaration and, if called upon to do so, I could and would testify competently to the matters set
9 forth herein.

10 4. I understand that Demaray LLC ("Demaray") sued Samsung Austin Semiconductor, LLC
11 as well as Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung
12 Semiconductor, Inc. (collectively, the "Samsung Defendants") in Case No. 6:20-cv-00636-ADA
13 in the United States District Court for the Western District of Texas ("Demaray-Samsung
14 Litigation"), alleging infringement of U.S. Patent Nos. 7,544,276 and 7,381,657.

15 5. I understand that Demaray alleges that the Samsung Defendants infringe by using and/or
16 configuring reactive magnetron sputtering reactors, including reactors in Applied's Endura
17 product line, for the deposition of layers, which Demaray identifies as metal nitride layers such as
18 TaN and/or TiN, in Samsung semiconductor products, including memory products such as
19 Samsung's DDR4 SDRAM.

20 6. I also understand that Applied filed an action for declaratory judgment of non-
21 infringement against Demaray in the United States District Court for the Northern District of
22 California. I understand that, in that declaratory judgment action, Applied filed a motion for
23 preliminary injunction to enjoin Demaray from proceeding with the Demaray-Samsung Litigation
24 while the declaratory judgment action is pending.

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28 *Ryan*

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7. Samsung Austin Semiconductor, LLC (SAS) owns and operates two semiconductor fabrication facilities. SAS opened its original fab (FAB1) in 1997 and its second fab (FAB2) in 2007. Those facilities are located in Austin, Texas.

[REDACTED]

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

DATED: October 9, 2020

By: Ryan Quint

Ryan