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REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

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 KEITH A.
MILLER IN SUPPORT OF APPLIED
MATERIALS, INC.'S REPLY IN
SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION**

MILLER DECL. IN SUPPORT OF
APPLIED'S MOTION FOR PRELIMINARY

1 I, Keith A. Miller, hereby declare as follows:

2 1. I am a Director of Engineering at Applied Materials, Inc. ("Applied") where I have been
3 employed since 1997. I have been in this role for approximately 10 years and am responsible for
4 engineering and design of Applied's physical vapor deposition (PVD) process chambers. Prior to
5 this role, I was an Engineering Manager and Mechanical Engineer at Applied. I either have
6 personal knowledge of the facts contained in this declaration or they are based on research
7 conducted under my supervision and direction. If called upon to do so, I could and would testify
8 competently to the matters set forth herein.

9 2. I submit this declaration in support of Applied's Reply in Support of Its Motion for a
10 Preliminary Injunction.

11 3. I understand that Demaray LLC ("Demaray") has filed patent infringement suits against
12 Applied's customers, Intel Corporation ("Intel") and multiple Samsung entities (collectively,
13 "Samsung") in the Western District of Texas, and has identified Applied's Endura product line
14 (specifically "reactors that can be configured for deposition of TaN layers (*e.g.*, CuBS RFX PVD
15 with the Encore II Ta(N) barrier chamber) and TiN (*e.g.*, Cirrus ionized PVD chamber)" in its
16 complaints against Intel and Samsung.

17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]

22 5. Applied's headquarters are located in Santa Clara, California. In addition to Applied's
23 headquarters in Santa Clara, California, Applied has additional facilities around the United States,
24 including in Massachusetts, Montana, and Austin, Texas. Applied also has facilities around the
25 world, including China, various countries in Europe, India, Israel, Japan, Korea, Singapore, and
26 Taiwan.

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[REDACTED]

I declare under penalty of perjury that the foregoing is true and correct. Executed on
October 9, 2020.

By: Keith A. Miller
Keith A. Miller

