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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 JOSEPH 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 HASTINGS 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 DISTRICT OF CALIFORNIA  
 14

15 APPLIED MATERIALS, INC.,

16 Plaintiff,

17 vs.

18 DEMARAY LLC,

19 Defendant.  
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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