

EXHIBIT J

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

DEMARAY LLC,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

Case No. 6:20-cv-00634-ADA

**DEMARAY LLC'S TRANSFER-RELATED INTERROGATORIES TO
INTEL CORPORATION**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Local Rule 33, the Court's Standing Order Regarding Venue and Jurisdictional Discovery Limits for Patent Cases, the Court's Order Governing Proceedings – Patent Case (Version 3.2), and the Court's Scheduling Order in this case, Plaintiff Demaray LLC ("Demaray") requests that Defendant Intel Corporation ("Intel") serve a written response and produce for examination, inspection, and copying by Demaray the documents and tangible things in the categories specified below, within fourteen (14) days after service hereof, at the offices of Irell & Manella, LLP, 1800 Avenue of the Stars, Suite 900, Los Angeles, CA 90067.

DEFINITIONS

Each of these definitions and instructions is incorporated into each of the interrogatories to which it pertains.

1. "You," "your," and "Intel" mean Intel, and all predecessors, subsidiaries, parents, and affiliates, and all past or present directors, officers, agents, representatives, employees, consultants, attorneys, entities acting in joint-venture or partnership relationships with Intel, and others acting on behalf of Intel.
2. The term "Intel RMS PVD chamber" refers to any reactor chamber used for physical vapor deposition ("PVD") of a thin film using reactive magnetron sputtering ("RMS") used in the production of Intel semiconductor products, or research related thereto, in the last six years from the filing of Demaray's Complaint.
3. The term "Intel semiconductor products" refers to all Intel semiconductor products that include at least one layer of material deposited with an Intel RMS PVD chamber.
4. The term "person" refers to any natural person, firm, association, organization, partnership, sole proprietorship, business trust, corporation or public entity.
5. The terms "document" or "documents" are used herein in their customary broad sense, and mean any kind of printed, recorded, written, graphic, or photographic matter (including tape recordings), however printed, produced, reproduced, coded or stored, of any kind or description, whether sent or received or not, including originals, copies, drafts, and both sides thereof, and including papers, books, charts, graphs, photographs, drawings, correspondence,

telegrams, cables, telex messages, memoranda, notes, notations, work papers, routing slips, intra and inter-office communications, electronic mail, affidavits, statements, opinions, court pleadings, reports, indices, studies, analyses, forecasts, evaluations, contracts, computer printouts, data processing input and output, computer programs, microfilms, microfiche, all other records kept by electronic, photographic, or mechanical means, and things similar to any of the foregoing, regardless of their author or origin, or any kind.

6. The terms “and” and “or” are terms of inclusion and not of exclusion and are to be construed either disjunctively or conjunctively as necessary to bring within the scope of these requests any documents or responses which might otherwise be construed to be outside their scope.

7. Nouns, whether singular or plural herein, shall be construed either as singular or plural as necessary to bring within the scope of these requests any documents or responses which might otherwise be construed to be outside their scope.

8. The term “including” means “including without limitation,” as appropriate, so as to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope. The term “all” means “any and all,” as appropriate.

INSTRUCTIONS

1. In answering the following Interrogatories, you are instructed to furnish all available information, including information in the possession, custody or control of any of Intel’s attorneys, directors, officers, agents, employees, representatives, associates, investigators, divisions, affiliates, partnerships, parents, subsidiaries and person under Intel’s control, who have the best knowledge, not merely information known to Intel based on Intel’s personal knowledge. Information is within your possession, custody, or control if, as a practical matter, you have the ability, upon request, to obtain the information.

2. If you cannot fully respond to the following Interrogatories after exercising due diligence to secure the information requested thereby, so state, and specify the portion of each Interrogatory that cannot be responded to fully and completely. State what efforts were made to obtain the requested information and the facts relied upon that support the contention that the

Interrogatory cannot be answered fully and completely; and state what knowledge, information or belief Intel has concerning the unanswered portion of any such Interrogatory.

3. If you produce documents in connection with these Interrogatories:

- a. The documents produced should be organized and labeled to correspond to the categories in these Interrogatories.
- b. Alternatively, if documents are produced as they are kept in the usual course of business, you should provide documents sufficient to show that the documents produced have been produced as they are kept in the usual course of business.

4. If you withhold any information requested on grounds that it is protected from discovery by the attorney-client privilege, work-product doctrine, or other privilege, you must furnish a log providing the following information for each item of information withheld:

- a. the reason for withholding the document;
- b. the type of document;
- c. the subject matter of the document;
- d. the date of the document;
- e. the name, organization, and position, if any, of each author, sender, and recipient of the document;
- f. the name of the current or last known custodian of each such document; and
- g. if work-product is asserted, the proceeding for which the document was created.

5. If Intel's response to a particular Interrogatory is a statement that it lacks the ability to comply with that Interrogatory, Intel shall specify whether the inability to comply is because the particular item or category of information never existed, has been destroyed, has been lost, misplaced or stolen, or has never been or is no longer in Intel's possession, custody or control. Intel shall identify the name and address of any person or entity known or believed by Intel to have possession, custody or control of that information or category of information.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.