

# EXHIBIT K

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

**DEMARAY LLC,**

Plaintiff,

v.

**SAMSUNG ELECTRONICS CO., LTD (A  
KOREAN COMPANY), SAMSUNG  
ELECTRONICS AMERICA, INC.,  
SAMSUNG SEMICONDUCTOR, INC., and  
SAMSUNG AUSTIN SEMICONDUCTOR,  
LLC,**

Defendants.

**Case No. 6:20-cv-00636-ADA**

**DEMARAY LLC'S TRANSFER-RELATED INTERROGATORIES TO  
SAMSUNG DEFENDANTS**

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 Defendants Samsung Electronics Co., Ltd. ("SEC"), Samsung Electronics America, Inc. ("SEA"), Samsung Semiconductor, Inc. ("SSI"), and Samsung Austin Semiconductor, LLC ("SAS") (collectively, "Samsung") 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 "Samsung" mean Samsung, 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 Samsung, and others acting on behalf of Samsung.

2. "SAS" means Samsung Austin Semiconductor, LLC, 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 SAS, and others acting on behalf of SAS.

3. The term "Samsung 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 Samsung semiconductor products, or research related thereto, in the last six years from the filing of Demaray's Complaint.

4. The term "Samsung semiconductor products" refers to all Samsung semiconductor products that include at least one layer of material deposited with a Samsung RMS PVD chamber.

5. The term “person” refers to any natural person, firm, association, organization, partnership, sole proprietorship, business trust, corporation or public entity.

6. 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.

7. 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.

8. 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.

9. 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 Samsung’s attorneys, directors, officers, agents, employees, representatives, associates, investigators, divisions, affiliates, partnerships, parents, subsidiaries and person under Samsung’s

control, who have the best knowledge, not merely information known to Samsung based on Samsung'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 Samsung 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.

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