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14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN JOSE DIVISION

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|----|--------------------------|---|---------------------------------------|
| 18 | APPLIED MATERIALS, INC., |) | Case No. 5:20-cv-09341-EJD |
| | |) | |
| 19 | Plaintiff, |) | DECLARATION OF OLIVIA L. WEBER |
| | |) | IN SUPPORT OF DEMARAY LLC'S |
| 20 | vs. |) | NOTICE OF MOTION AND MOTION TO |
| | |) | AMEND ITS ANSWER TO ADD |
| 21 | DEMARAY LLC, |) | AFFIRMATIVE COUNTERCLAIMS FOR |
| | |) | INFRINGEMENT |
| 22 | Defendant. |) | |
| 23 | |) | |

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DECLARATION OF OLIVIA L. WEBER

I, Olivia L. Weber, hereby declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel for Defendant Demaray LLC ("Demaray"), and am admitted to practice in the United States District Court, Northern District of California. I have personal knowledge of each fact stated in this declaration and, if called as a witness, I could and would competently and truthfully testify thereto.

2. Attached as Exhibit 1 is a copy of Demaray's Proposed Amended Answer.

3. Attached as Exhibit 2 is a redlined copy of Demaray's Proposed Amended Answer, which reflects Demaray's proposed amendments.

4. Attached as Exhibit 3 is the cover page of Plaintiff Applied Materials Inc.'s ("Applied") First Supplemental Objections and Responses to Demaray's Interrogatories, Set One, which designates the entire document as "**CONFIDENTIAL – OUTSIDE COUNSEL EYES ONLY.**"

5. Attached as Exhibit 4 is an excerpt from a November 4, 2021 discovery hearing in co-pending Texas cases. *Demaray LLC v. Intel Corp.*, Case No. 6:20-cv-00634 (W.D. Tex.); *Demaray LLC v. Samsung Electronics, Co., et al.*, Case No. 6:20-cv-00636 (W.D. Tex.) (collectively, the "Texas cases"). Applied in this case shares counsel with the defendants in the Texas cases.

6. Attached as Exhibit 5 is an excerpt from a September 27, 2021 discovery hearing in the Texas cases.

7. Attached as Exhibit 6 is an excerpt from an August 17, 2021 claim construction hearing in the Texas cases.

Executed on March 9, 2022 in Newport Beach, California. I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 9, 2022

Respectfully submitted,
IRELL & MANELLA LLP

By: /s/ Olivia L. Weber

Olivia L. Weber
Attorneys for Defendant DEMARAY LLC