

1 YAR R. CHAIKOVSKY (SB# 175421)
 yarchaikovsky@paulhastings.com
 2 PHILIP OU (SB# 259896)
 philipou@paulhastings.com
 3 JOSEPH J. RUMPLER, II (SB# 296941)
 josephrumpler@paulhastings.com
 4 DAVID OKANO (SB# 278485)
 davidokano@paulhastings.com
 5 ANDY LEGOLVAN (SB# 292520)
 andylegolvan@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 MATTHIAS KAMBER (SB#232147)
 matthiaskamber@paulhastings.com
 11 PAUL HASTINGS LLP
 101 California Street, 48th Floor
 12 San Francisco, California 94111
 Telephone: 1(415) 856-7000
 13 Facsimile: 1(415) 856-7100

14 Attorneys for Plaintiff
 APPLIED MATERIALS, INC.

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA

19 APPLIED MATERIALS, INC.,
 20 Plaintiff,
 21 vs.
 22 DEMARAY LLC,
 23 Defendant.

CASE NO. 5:20-cv-09341-EJD

**DECLARATION OF RADHESH
 DEVENDRAN IN SUPPORT OF
 PLAINTIFF APPLIED MATERIALS,
 INC.'S OPENING CLAIM
 CONSTRUCTION BRIEF**

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1 I, Radhesh Devendran, hereby declare as follows:

2 1. I am an associate with the law firm Paul Hastings LLP, counsel for the Plaintiff Applied
3 Materials, Inc. (“Applied”). I have personal knowledge of the facts contained in the declaration
4 and, if called upon to do so, I could and would testify competently to the matters set forth herein.

5 2. I submit this declaration in support of Applied’s Opening Claim Construction Brief in the
6 above captioned action.

7 3. Attached hereto as **Exhibit 1** is a true and correct copy of U.S. Patent No. 7,381,657.

8 4. Attached hereto as **Exhibit 2** is a true and correct copy of U.S. Patent No. 7,544,276.

9 5. Attached hereto as **Exhibit 3** is a true and correct copy of the Declaration of Alexander D.
10 Glew from *Demaray LLC v. Intel Corp.*, 6:20-cv-00634-ADA and *Demaray LLC v. Samsung*
11 *Elecs. Co., Ltd.*, 6:20-cv-00636-ADA, dated February 16, 2021.

12 6. Attached hereto as **Exhibit 4** is a true and correct copy of the Patent Owner’s Preliminary
13 Response from *Applied Materials, Inc. v. Demaray LLC*, IPR2021-00103, dated February 16,
14 2021.

15 7. Attached hereto as **Exhibit 5** is a true and correct copy of the prosecution history for U.S.
16 Patent No. 7,378,356 (U.S. Patent App. No. 10/101,863).

17 8. Attached hereto as **Exhibit 6** is a true and correct copy of the Declaration of Dr. R.E.
18 Demaray under 37 C.F.R. § 1.132 submitted during prosecution of U.S. Patent Application No.
19 10/101,863, dated June 7, 2006.

20 9. Attached hereto as **Exhibit 7** is a true and correct copy of the prosecution history for U.S.
21 Patent No. 7,544,276 (U.S. Patent Application No. 11/228,834).

22 10. Attached hereto as **Exhibit 8** is a true and correct copy of the prosecution history for U.S.
23 Patent No. 7,381,657 (U.S. Patent Application No. 10/954,182).

24 11. Attached hereto as **Exhibit 9** is a true and correct copy of the transcript for the August 17,
25 2021 *Markman* hearing in *Demaray LLC v. Intel Corp.*, 6:20-cv-00634-ADA and *Demaray LLC*
26 *v. Samsung Elecs. Co., Ltd.*, 6:20-cv-00636-ADA.

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1 12. Attached hereto as **Exhibit 10** is a true and correct copy of Demaray LLC's Proposed
2 Constructions in *Demaray LLC v. Intel Corp.*, 6:20-cv-00634-ADA and *Demaray LLC v.*
3 *Samsung Elecs. Co., Ltd.*, 6:20-cv-00636-ADA.

4 13. Attached hereto as **Exhibit 11** is a true and correct copy of Demaray LLC's Disclosure of
5 Extrinsic Evidence in *Demaray LLC v. Intel Corp.*, 6:20-cv-00634-ADA and *Demaray LLC v.*
6 *Samsung Elecs. Co., Ltd.*, 6:20-cv-00636-ADA.

7 14. Attached hereto as **Exhibit 12** is a true and correct copy of Demaray LLC's Reply Claim
8 Construction Brief in *Demaray LLC v. Intel Corp.*, 6:20-cv-00634-ADA and *Demaray LLC v.*
9 *Samsung Elecs. Co., Ltd.*, 6:20-cv-00636-ADA, dated March 19, 2021.

10 15. Attached hereto as **Exhibit 13** is a true and correct copy of the transcript for the
11 deposition of Alexander Glew, Ph.D., in *Applied Materials, Inc. v. Demaray LLC*, IPR2021-
12 00103 and *Applied Materials, Inc. v. Demaray LLC*, IPR-2021-00104, dated November 15, 2021.

13 16. Attached hereto as **Exhibit 14** is a true and correct excerpt from the Handbook of Radio &
14 Wireless Technology, bates-numbered DEFTS-PA_0000989 to DEFTS-PA_0000997.

15 17. Attached hereto as **Exhibit 15** is a true and correct copy of the transcript for the
16 deposition of Alexander D. Glew, Ph.D. in the above-captioned case, dated February 17, 2022.

17 18. Attached hereto as **Exhibit 16** is a true and correct copy of Demaray LLC's Patent Local
18 Rules 4-2 Disclosures – Preliminary Claim Constructions in the above-captioned case, dated
19 January 7, 2022.

20 19. Attached hereto as **Exhibit 17** is a true and correct copy of Artisan Technology Group,
21 The Advanced Energy MDX Magneton Drive (1993), bates-numbered DEFTS-PA_0000006 to
22 DEFTS-PA_0000250.

23 20. Attached hereto as **Exhibit 18** is a true and correct copy of Harpold and Scholl of
24 Advanced Energy Industries, Inc. Whitepaper, How Advanced Energy, MDX Products Manage
25 Arcs (2001).

26 21. Attached hereto as **Exhibit 19** is a true and correct excerpt of the McGraw-Hill Dictionary
27 of Scientific and Technical Terms, Fifth Edition, bates-numbered DEFTS-PA_0004686 to
28 DEFTS-PA_0004690.

1 22. Attached hereto as **Exhibit 20** is a true and correct copy of Defendants' demonstratives
2 for the supplemental *Markman* hearing on '657 patent claim 2 terms in *Demaray LLC v. Intel*
3 *Corp.*, 6:20-cv-00634-ADA and *Demaray LLC v. Samsung Elecs. Co., Ltd.*, 6:20-cv-00636-ADA,
4 dated February 28, 2022.

5 23. Attached hereto as **Exhibit 21** is a true and correct copy of a document prepared for
6 demonstrative purposes depicting a timeline of true and correct excerpts of the file history for U.S.
7 Patent No. 7,381,657.

8 24. Attached hereto as **Exhibit 22** is a true and correct copy of the Declaration of Alexander
9 D. Glew in the above-captioned case, dated February 1, 2022, and corresponding errata sheet,
10 dated February 16, 2022.

11 25. Attached hereto as **Exhibit 23** is a true and correct excerpt of Graf, *Modern Dictionary of*
12 *Electronics* (1999), bates-numbered DEFTS-PA_0002784 to DEFTS-PA_0002797.

13 26. Attached hereto as **Exhibit 24** is a true and correct copy of U.S. Patent No. 7,262,131.

14 27. Attached hereto as **Exhibit 25** is a true and correct excerpt of Elshabini-Riad and Barlow
15 III, *Thin Film Technology Handbook* (1998), bates-numbered DEFTS-PA_0002806 to DEFTS-
16 PA_0002823.

17 28. Attached hereto as **Exhibit 26** is a true and correct copy of U.S. Patent No. 5,561,004.

18 29. Attached hereto as **Exhibit 27** is a true and correct copy of U.S. Patent No. 6,281,142.

19 30. Attached hereto as **Exhibit 28** is a true and correct copy of U.S. Patent No. 5,303,319.

20 31. Attached hereto as **Exhibit 29** is a true and correct copy of U.S. Patent No. 5,483,613.

21 32. Attached hereto as **Exhibit 30** is a true and correct copy of U.S. Patent Publication No.
22 2007/0053139 A1.

23 33. Attached hereto as **Exhibit 31** is a true and correct copy of the Patent Owner's
24 Preliminary Response from *Applied Materials, Inc. v. Demaray LLC*, IPR2021-00104, dated
25 February 16, 2021.

26 34. Attached hereto as **Exhibit 32** is a true and correct copy of the Declaration of Alexander
27 D. Glew from *Applied Materials, Inc. v. Demaray LLC*, IPR2021-00103, dated September 1,
28 2021.

1 35. Attached hereto as **Exhibit 33** is a true and correct copy of Defendants' demonstratives
2 for the *Markman* hearing in *Demaray LLC v. Intel Corp.*, 6:20-cv-00634-ADA and *Demaray LLC*
3 *v. Samsung Elecs. Co., Ltd.*, 6:20-cv-00636-ADA, dated August 17, 2021.

4 36. Attached hereto as **Exhibit 34** is a true and correct copy of a presentation from Dr. Ernest
5 Demaray, Introduction to Optical Capabilities including thin film passivation and barrier
6 applications, dated January 15, 2021, bates-numbered DEFTS-PA_0003208-DEFTS-
7 PA_0003288.

8 37. Attached hereto as **Exhibit 35** is a true and correct copy of a presentation from Dr. Ernest
9 Demaray, Introduction to Demaray LLC Patent Portfolio, Official Thin Film Passivation, barrier
10 and Encapsulation applications, dated January 15, 2021, bates-numbered DEFTS-PA_0002691-
11 DEFTS-PA_0002774.

12 I declare under penalty of perjury that the foregoing is true and correct.

13 DATED: March 18, 2022

14 By: /s/ Radhesh Devendran

15 Radhesh Devendran
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