

EXHIBIT 11

**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

JURY TRIAL DEMANDED

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

JURY TRIAL DEMANDED

PLAINTIFF DEMARAY LLC'S DISCLOSURE OF EXTRINSIC EVIDENCE

Pursuant to the Court's scheduling order, Plaintiff Demaray LLC ("Demaray") hereby provides its disclosure of extrinsic evidence that Demaray may rely on for its claim construction positions for U.S. Patent Nos. 7,544,276 and 7,381,657 (the "Demaray Patents"). These disclosures are solely for purposes of the parties' meet-and-confer process. Demaray reserves its right to add, remove, or modify any of its proposed constructions and claim construction positions based on any disclosures made by the above-captioned Defendants (collectively, "Defendants") or as a result of the parties' further discussions.

Demaray reserves its right to rely on any and all intrinsic evidence in support of its claim construction positions. Demaray also reserves its right to add or remove citations to any extrinsic evidence based on any disclosures made by Defendants or as a result of the parties' further discussions. Demaray further reserves its right to rely on any extrinsic evidence cited by Defendants or as needed to rebut Defendants' proposed constructions or evidence.

I. DISCLOSURE OF EXTRINSIC EVIDENCE

Demaray may rely on the expert testimony of Dr. Alexander D. Glew. Dr. Glew is expected to testify regarding why Demaray's proposed constructions are consistent with how one of ordinary skill in the art would understand the disputed terms in the context of the patents in which they appear and why Defendants' constructions are not consistent with how one of ordinary skill in the art would understand the term in the context of the Demaray Patents. In particular, Dr. Glew may offer testimony regarding the underlying technology of the Demaray Patents, including, but not limited to, the process of depositing thin films using physical vapor deposition, potential problems associated with depositing thin films, how the Demaray Patents address such problems, how a person of ordinary skill in the art would understand the claim terms in that context, and how a person of ordinary skill in the art would not understand Defendants' proposed constructions to be correct in that context. Demaray may also rely on John E. Mahan, *Physical Vapor Deposition of Thin Films* (2000), for background information. In addition, Demaray may also rely on the following additional extrinsic evidence:

Proposed Terms	Proposed Constructions	Extrinsic Evidence
“substrate”	<p>Plain and ordinary meaning</p> <p>or</p> <p>“material that provides the surface on which something is deposited or inscribed, for example a silicon wafer used to manufacture integrated circuits”</p>	<p>Expert testimony of Dr. Glew regarding how a person of ordinary skill in the art would understand the term “substrate,” including technical background concerning the claim term and what one of ordinary skill in the art would understand the claim term to mean in view of the patent disclosure, the prosecution history, and/or the extrinsic evidence.</p> <p>substrate (The New Oxford American Dictionary, 2001): “a substance or layer that underlies something, or on which some process occurs, in particular: ... a material that provides the surface on which something is deposited or inscribed, for example the silicon wafer used to manufacture integrated circuits”</p>
“pulsed DC power supply”	<p>Plain and ordinary meaning</p> <p>or</p> <p>“supply for providing direct current power that oscillates between positive and negative voltages”</p>	<p><i>See</i> Extrinsic Evidence for “pulsed DC power,” cited <i>infra</i>.</p>
“pulsed DC power”	<p>Plain and ordinary meaning</p> <p>or</p>	<p>Expert testimony of Dr. Glew regarding how a person of ordinary skill in the art would understand the term “pulsed DC power [supply],”</p>

	<p>“direct current power that oscillates between positive and negative voltages”</p>	<p>including technical background concerning the claim term and what one of ordinary skill in the art would understand the claim term to mean in view of the patent disclosure, the prosecution history, and/or the extrinsic evidence.</p> <p>pulse (Modern Dictionary of Electronics (7th ed.): “1. A variation of a quantity whose value is normally constant; this variation is characterized by a rise and a decay and has finite amplitude and duration. 2. An abrupt change in voltage, either positive or negative, that conveys information to a circuit. <i>See also</i> impulse. 3. A brief excursion of a quantity from normal. 4. Signal characterized by the rise and decay in time of a quantity whose value is normally constant. 7. A sudden and abrupt jump in an electrical quantity from its usual level to a higher or lower value, quickly followed by an equally abrupt return. ”</p>
<p>“narrow band-rejection filter”</p>	<p>Plain and ordinary meaning</p> <p>or</p> <p>“filter that passes all of the frequencies of the power supply except within a narrow band”</p>	<p>Expert testimony of Dr. Glew regarding how a person of ordinary skill in the art would understand the term “narrow band-rejection filter,” including technical background concerning the claim term and what one of ordinary</p>

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