

EXHIBIT 15

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3

4 APPLIED MATERIALS, INC.,)

5 Plaintiff,)

6 vs.) CASE NO. 5:20-cv-09341-EJD

7 DEMARAY LLC,)

8 Defendant.)

9) Page 1-309

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12

13

14 REMOTE VIDEOTAPED DEPOSITION OF

15 ALEXANDER D. GLEW, Ph.D

16 TAKEN ON

17 THURSDAY, FEBRUARY 17, 2022

18

19

20

21

22 Reported by: BRENDA R. COUNTZ, RPR-CRR

23 CSR NO. 12563

24 Job. No 206632

25

<p>1 2 3 4 5 6 7 8 9 10 Remote Videotaped deposition of 11 ALEXANDER D. GLEW, Ph.D, taken via Zoom or 12 teleconference in Los Angeles, California, on 13 Thursday, February 17, 2022, before Brenda R. 14 Countz, CSR No. 12563. 15 16 17 18 19 20 21 22 23 24 25</p>	<p>Page 2</p>	<p>1 APPEARANCES OF COUNSEL: 2 (All counsel and participants present 3 via Zoom and/or teleconference.) 4 FOR THE PLAINTIFF APPLIED MATERIALS: 5 Paul Hastings 6 BY: Philip Ou, Esq. 7 Yar Chaikovsky, Esq. 8 1117 S. California Avenue 9 Palo Alto, CA 94304 10 11 12 13 14 FOR THE DEFENDANT DEMARAY: 15 Irell & Manella 16 BY: Olivia Weber, Esq. 17 Samuel Lu, Esq. 18 840 Newport Center Drive 19 Newport Beach, CA 92660 20 21 22 23 24 ALSO PRESENT: 25 STEPHAN ANDREYCHUK, Videographer</p>	<p>Page 3</p>
<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>Page 4</p>	<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>Page 5</p>

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1 LOS ANGELES, CA - THURSDAY, FEBRUARY 17, 2022
 2 9:08 A.M.
 3
 4 THE VIDEOGRAPHER: Good morning, my
 5 name is Stephan Andreychuk. I am the legal
 6 videographer in association with TSG Reporting,
 7 Incorporated. Due to Covid-19 and following the
 8 practice of social distancing I will not be in
 9 the same room with the witness. Instead, I will
 10 record this videotaped deposition remotely.
 11 The court reporter is Brenda Countz;
 12 also will not be in the same room and will swear
 13 in the witness remotely.
 14 Do all parties stipulate to the
 15 validity of this video recording and remote
 16 swearing and that it will be admissible in the
 17 courtroom as if it had been taken following Rule
 18 30 of Federal Rules of Civil Procedures and the
 19 states' rules where this case is pending?
 20 MR. OU: Plaintiff, Applied Materials,
 21 agrees.
 22 MS. WEBER: Demaray LLC agrees.
 23 THE VIDEOGRAPHER: Thank you. This is
 24 the start of media labeled number one of the
 25 video recorded deposition of Dr. Andrew Glew in

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1 ALEXANDER D. GLEW, Ph.D,
 2 having been first duly sworn, was
 3 examined and testified as follows:
 4
 5 EXAMINATION
 6 BY MR. OU:
 7 Q. Good morning, Dr. Glew.
 8 A. Good morning.
 9 Q. Could you please state your full name
 10 for the record?
 11 A. I am Alexander David Glew. I noticed
 12 that you noticed an Andrew Glew. Andrew Glew is
 13 a different individual.
 14 Q. Apologies.
 15 A. Dr. Andrew Glew is in this industry
 16 also but is a different person.
 17 Q. I appreciate that clarification, Dr.
 18 Glew.
 19 Dr. Glew, is it correct that you are
 20 attending this deposition remotely from your
 21 business office?
 22 A. Yes, I am.
 23 Q. And is that at 240 Pamela Drive,
 24 Mountain View, California, 94040?
 25 A. Yes, it is.

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1 the matter of Applied Materials, Incorporated
 2 versus Demaray LLC in the United States District
 3 Court, Northern District of California. The case
 4 number is 5:20-cv-09341-EJD.
 5 This deposition is being held via Zoom
 6 with all participants attending remotely.
 7 Today's date is February 17, 2021 and the time is
 8 9:10 a.m. Pacific time.
 9 My name is Stephan Andreychuk. I'm the
 10 legal video specialist from TSG Reporting,
 11 Incorporated, headquartered at 228 East 45th
 12 Street, Suite 810, New York, New York 10017. The
 13 court reporter today is Brenda Countz also with
 14 TSG Reporting.
 15 Counsel, please introduce yourselves.
 16 MR. OU: Good morning. This is Philip
 17 Ou from Paul Hastings on behalf of Applied
 18 Materials and with me is my colleague, Yar
 19 Chaikovsky, also from Paul Hastings.
 20 MS. WEBER: Good morning. My name is
 21 Olivia Weber from Irell & Manella on behalf of
 22 Demaray LLC and with me is my colleague, Sam Lu.
 23 THE VIDEOGRAPHER: Thank you.
 24 Will the court reporter please swear in
 25 the witness.

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1 Q. Is there anyone in your office today?
 2 A. No.
 3 Q. And you are joining this deposition
 4 through computer, is that right?
 5 A. Yes, through a computer.
 6 Q. Do you have any applications open on
 7 your computer other than this Zoom?
 8 A. No.
 9 Q. Are you sure?
 10 A. I'm closing the last one now.
 11 Q. What did you just close, Dr. Glew?
 12 A. I closed Firefox. I had the Zoom link
 13 and my calender on there. Unfortunately I closed
 14 it earlier and I had to reopen it earlier to get
 15 back in. It took two minutes.
 16 Q. Okay, no problem.
 17 Dr. Glew, you understand that because
 18 we are taking this deposition remotely, there is
 19 no one on our end that can monitor what you may
 20 or may not have in front of you during the
 21 deposition, right?
 22 A. Yes.
 23 Q. And do you agree that for the course of
 24 the deposition you won't open any applications on
 25 your computer?

<p style="text-align: right;">Page 10</p> <p>1 A. Yes, other than Adobe to open the files 2 you will probably send me. 3 Q. Sure, other than Adobe to open some 4 exhibits, do you agree you won't open any other 5 applications? 6 A. Yes. 7 Q. And do you have a phone with you? 8 A. I have a desk phone, yes, and a mobile 9 phone. 10 Q. Okay. I don't need you to turn your 11 mobile phone off but will you agree not to use 12 your mobile phone during the course of the 13 deposition? 14 A. Yes. 15 Q. You can certainly use it during the 16 break if needed but you understand that you 17 shouldn't be using your phone to communicate with 18 anyone or to receive messages, notes from your 19 counsel or anyone else during the course of the 20 deposition, right? 21 A. Yes. 22 Q. I understand, Dr. Glew, that you have a 23 witness binder with you, is that right? 24 A. Yes, I do. 25 Q. That's one that was provided by your</p>	<p style="text-align: right;">Page 11</p> <p>1 counsel? 2 A. Yes, it was. 3 Q. For the record, I have a copy of that 4 binder and I just want to make sure logistically 5 that have you the same thing that I have. So 6 bear with me, okay? 7 My understanding is your binder has an 8 index that has 14 tabs, is that right? 9 A. Yes, it does. 10 Q. Now before I mark each of these 11 exhibits, do you have any notes, handwritten 12 notes on any of those exhibits that you have? 13 A. No, I don't. 14 Q. Do you have any notes whatsoever in 15 front of you? 16 A. No. 17 Q. Is it fair that the only documents that 18 you have in front of you are the ones in your 19 witness binder? 20 A. The ones in my witness binder. I also 21 have my errata in the witness binder. 22 Q. Understood, and we received that this 23 morning, thank you. 24 So other than the 14 exhibits in your 25 witness binder and your errata, do you have any</p>
<p style="text-align: right;">Page 12</p> <p>1 other documents in front of you? 2 A. No. 3 Q. At some point if you feel the need to 4 grab another document that may happen to be in 5 your office or look at something, will you please 6 let us know what that is? 7 A. Yes. 8 Q. I trust that if you don't inform us, 9 that you won't have any other documents or notes 10 that you are referencing during the course of the 11 deposition, is that fair? 12 A. That's fair, yes. 13 Q. Great. Why don't we do this, so that 14 we save the time later. I'm going to mark each 15 of the documents in your witness binder as 16 exhibits one by one, is that okay? 17 A. Okay. 18 Q. So what we're going to mark as 19 Exhibit 1 is your Claim Construction Declaration 20 that you provided in this case pending in the 21 Northern District of California, is that right? 22 A. Yes. 23 (Glew Exhibit 1, Claim 24 Construction Declaration, was 25 marked for identification.)</p>	<p style="text-align: right;">Page 13</p> <p>1 BY MR. OU: 2 Q. So we've marked as Exhibit 1 your Claim 3 Construction Declaration. 4 I have Exhibit 2 as your CV, is that 5 right? 6 A. Yes. 7 (Glew Exhibit 2, Curriculum Vitae 8 of Dr. Alexander Glew, was marked 9 for identification.) 10 BY MR. OU: 11 Q. We will mark as Exhibit 2 the CV of Dr. 12 Glew. Exhibit 3 we will mark as U.S. Patent 13 Number 7,544,276? 14 A. Yes. 15 (Glew Exhibit 3, U.S. Patent 16 Number 7,544,276, was marked for 17 identification.) 18 BY MR. OU: 19 Q. Okay. And the next tab is U.S. Patent 20 Number 7,381,657, is that right? 21 A. Yes. 22 Q. We will mark that patent as Exhibit 4, 23 is that okay? 24 A. Yes. 25 (Glew Exhibit 4 U.S. Patent</p>

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