

EXHIBIT 3

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

DECLARATION OF ALEXANDER D. GLEW

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I. INTRODUCTION

1. My name is Alexander D. Glew, Ph.D., P.E. I have been asked to explain, from a technical perspective, how certain terminology in the patents at issue would have been used and understood by people working in the semiconductor fabrication field.



II. BACKGROUND AND QUALIFICATIONS

2. For 33 years, I have been involved with engineering practice. A large portion of my work has involved semiconductor fabrication, including product design, semiconductor device analysis, semiconductor equipment design and analysis, thin film processing, equipment, characterization, and project development. I was intimately involved in this field during the time of the patents at issue in this case.

3. I received my Bachelor of Science in Mechanical Engineering from the University of California, Berkeley, in 1985; I received my Master of Science in Mechanical Engineering from the University of California, Berkeley, in 1987; I received my Master of Science in Materials Science and Engineering from Stanford University in 1995.

4. I received my Doctor of Philosophy in Materials Science and Engineering from Stanford University in 2003. My dissertation involved plasma CVD of diamond-like carbon, fluorinated diamond-like carbon, and low k dielectrics.

5. I began my career with Applied Materials, Inc., one of the leading companies that supplies equipment for semiconductor manufacturers. My services to Applied Materials included various engineering roles: product development, project management, core technology, and supplier quality management. I remained at Applied Materials for ten years.

6. I hold six patents on technologies such as tungsten chemical vapor deposition, and ultra-high purity and high-temperature valves, and thin film heater and chuck design for processing chambers. I have authored or co-authored over nine articles, presentations, and seminars on topics including semiconductor thin film processing and diamond like carbon.

7. Additional details of my education and employment history, recent professional service, patents, publications, and other testimony are set forth in my current curriculum vitae, attached as Exhibit A.

III. PREPARATION AND MATERIALS CONSIDERED

8. In forming my opinions, I have considered the specifications of the patents at

issue, U.S. Patent Nos. 7,544,276 and 7,381,657 (“’276 Patent” and “’657 Patent,” respectively), including their respective abstracts, figures, and the claim language, as would have been understood by a person of ordinary skill in the art (“POSITA”). I have also reviewed the file histories of the ’276 Patent and the ’657 Patent, and the other material cited in this report.

9. I have also relied on my personal knowledge and professional experience in designing and developing equipment for semiconductor manufacturing, and on the documents and information referenced in this report. I am also aware of information generally available to, and relied upon by, persons of ordinary skill in the art at the relevant time, including, for example, textbooks, manuals, technical papers, and articles, as well as commercially available systems.

10. Throughout this declaration, I refer to specific portions of the ’276 Patent and the ’657 Patent and other documents. The citations are intended to be exemplary and are not intended to convey that the citations are the only source of evidence to support the propositions for which they are cited.

11. In addition to opinions outlined herein, I may also offer opinions (1) in rebuttal to the defendants’ positions, including opinions of its experts and materials they discuss or rely upon, (2) based on any orders from the Court, or (3) based on documents, contentions, or other disclosures produced too late to be considered herein. I reserve the right to supplement or amend my opinions as further documentation and information is received.

12. If called to testify in this matter, I may use as exhibits various documents produced in this matter that refer or relate to the matters discussed herein. In addition, I may create or assist in the creation of certain demonstrative exhibits or summaries of my findings and opinions to assist me in testifying. Such exhibits have not yet been created.

13. I am being compensated by Demaray LLC for my time spent on this matter at my customary consulting rate of \$650 per hour, and my compensation is in no way contingent upon the outcome of this matter or on the opinions I offer. All of the opinions expressed in this report are my own.

IV. LEGAL STANDARDS

14. I have been advised by counsel on the law and general principles relevant to claim construction. I have applied these principles to the facts set forth in this report in rendering my opinions.

15. I understand that claims are interpreted from the perspective of a POSITA at the time of the invention. I understand that claim construction is a matter of law for the Court.

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