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14 Attorneys for Plaintiff  
15 APPLIED MATERIALS, INC.

16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18

19 APPLIED MATERIALS, INC.,

20 Plaintiff,

21 vs.

22 DEMARAY LLC,

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

**APPLIED MATERIALS INC.'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL**

1 Applied Materials Inc. (“Applied”) through counsel, and pursuant to Local Rules 7-11 and  
2 79-5, hereby moves for leave to file under seal portions of Applied’s Opposition to Demaray LLC’s  
3 (“Demaray”) Motion To Amend its Answer (the “Opposition”) and documents in support thereof  
4 as they contain highly confidential business information relating to Applied, Samsung Electronics  
5 America, Inc., Samsung Electronics Co., Ltd, Samsung Semiconductor, Inc., and Samsung Austin  
6 Semiconductor, LLC (collectively “Samsung”), and Intel Corporation (“Intel”) product details and  
7 configurations. This request is narrowly tailored to protect highly confidential business  
8 information.

9 Specifically, Applied seeks leave to file the following under seal:

- 10 • **Exhibits D–G, L** to the Declaration of Boris Lubarsky in Support of Applied’s  
11 Opposition to Demaray’s Motion to Amend its Complaint. (“Lubarsky Decl.”)  
12 include technical specifications, a PVD chamber manual, and Applied’s corporate  
13 representative’s testimony, and contain highly confidential Applied business  
14 information including details of proprietary reactor technology.
- 15 • **Exhibits A–C, J, K** to the Lubarsky Decl. are infringement contentions brought by  
16 Demaray in the customer suits in the Western District of Texas and contain highly  
17 confidential Intel, Samsung, and Applied business information including details of  
18 proprietary reactor technology. Demaray has also designated these infringement  
19 contentions as Highly Confidential under the respective protective orders in the  
20 customer suits in the Western District of Texas.
- 21 • Portions of Applied’s Opposition that cite or discuss the above information.

22 Applied states:

- 23 1. No protective order has yet issued in this action.
- 24 2. The above exhibits contain highly confidential business information including  
25 details of proprietary reactor technology. Applied has invested significant financial  
26 and technical resources in developing its proprietary reactor technology and public  
27 dissemination of the information could cause Applied and its customers, competitive  
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and financial harm by revealing proprietary and confidential information specific to Applied's trade secrets and intellectual property.

3. Demaray has also designated its infringement contentions as Confidential – Outside Counsels Eyes Only under the respective protective orders in the customer suits in the Western District of Texas.
4. Applied is filing herewith the Declaration of Boris Lubarsky in Support of Applied's Administrative Motion to File Under Seal and a Proposed Order.

WHEREFORE, Applied respectfully requests that this Court grant it leave to file the above exhibits under seal as set forth herein.

DATED: March 23, 2022

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