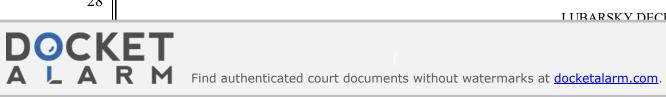
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14	Attorneys for Plaintiff	
15	APPLIED MATERIALS, INC.	
16	UNITED STATES DISTRICT COURT	
17	NORTHERN DISTRICT OF CALIFORNIA	
18		
19	APPLIED MATERIALS, INC.,	CASE NO. 5:20-cv-09341-EJD
20	Plaintiff,	DECLARATION OF BORIS LUBARSKY IN SUPPORT OF APPLIED MATERIALS, INC.'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL
21	VS.	
22	DEMARAY LLC,	
23	Defendant.	
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28		
_		LUBARSKY DECL IN SUPPORT



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I, Boris Lubarsky, hereby declare as follows:

- 1. I am an associate with the law firm Paul Hastings LLP, counsel for the Plaintiff Applied Materials, Inc. ("Applied"). I have personal knowledge of the facts contained in the declaration and, if called upon to do so, I could and would testify competently to the matters set forth herein.
- 2. I submit this declaration in support of Applied's Administrative Motion for Leave to File under Seal Applied's Opposition to Demaray LLC's ("Demaray") Motion to Amend its Complaint and documents in support thereof as they contain highly confidential business information relating to Applied, Samsung Electronics America, Inc., Samsung Electronics Co., Ltd, Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, LLC (collectively "Samsung"), and Intel Corporation ("Intel"). This request is narrowly tailored to protect highly confidential business information.
- 3. Exhibits D-G, L to the Declaration of Boris Lubarsky in Support of Applied's Opposition to Demaray's Motion to Amend its Complaint. ("Lubarsky Decl.") include technical specifications, a PVD chamber manual, and Applied's corporate representative's testimony, and contain highly confidential Applied business information including details of proprietary reactor technology.
- 4. Exhibits A-C, J, K to Lubarsky Decl. are supplemental infringement contentions brought by Demaray in the customer suits in the Western District of Texas and contain highly confidential Intel, Samsung, and Applied business information including details of proprietary reactor technology. Demaray has also designated these exhibits as Highly Confidential under the respective protective orders in the customer suits in the Western District of Texas.
- 5. Applied has invested significant financial and technical resources in developing its proprietary reactor technology and public dissemination of the information could cause Applied, Intel, and Samsung competitive and financial harm by revealing proprietary and confidential information specific to Applied's, Intel's, and Samsung's trade secrets and intellectual property.

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

LUBARSKY DECL. IN SUPPORT





LUBARSKY DECL IN SUPPORT