

1 YAR R. CHAIKOVSKY (SB# 175421)
 yarchaikovsky@paulhastings.com
 2 PHILIP OU (SB# 259896)
 philipou@paulhastings.com
 3 JOSEPH J. RUMPLER, II (SB# 296941)
 josephrumpler@paulhastings.com
 4 DAVID OKANO (SB# 278485)
 davidokano@paulhastings.com
 5 ANDY LEGOLVAN (SB# 292520)
 andylegolvan@paulhastings.com
 6 BORIS LUBARSKY (SB# 324896)
 borislubarsky@paulhastings.com
 7 PAUL HASTINGS LLP
 1117 S. California Avenue
 8 Palo Alto, California 94304-1106
 Telephone: 1(650) 320-1800
 9 Facsimile: 1(650) 320-1900

10 MATTHIAS KAMBER (SB#232147)
 matthiaskamber@paulhastings.com
 11 PAUL HASTINGS LLP
 101 California Street, 48th Floor
 12 San Francisco, California 94111
 Telephone: 1(415) 856-7000
 13 Facsimile: 1(415) 856-7100

14 Attorneys for Plaintiff
 APPLIED MATERIALS, INC.

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA

19 APPLIED MATERIALS, INC.,
 20 Plaintiff,
 21 vs.
 22 DEMARAY LLC,
 23 Defendant.

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

**DECLARATION OF BORIS
 LUBARSKY IN SUPPORT OF
 APPLIED MATERIALS, INC.'S
 ADMINISTRATIVE MOTION TO
 FILE UNDER SEAL**

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LUBARSKY DECL. IN SUPPORT

1 I, Boris Lubarsky, hereby declare as follows:

2 1. I am an associate with the law firm Paul Hastings LLP, counsel for the Plaintiff Applied
3 Materials, Inc. (“Applied”). I have personal knowledge of the facts contained in the declaration
4 and, if called upon to do so, I could and would testify competently to the matters set forth herein.

5 2. I submit this declaration in support of Applied’s Administrative Motion for Leave to File
6 under Seal Applied’s Opposition to Demaray LLC’s (“Demaray”) Motion to Amend its Complaint
7 and documents in support thereof as they contain highly confidential business information relating
8 to Applied, Samsung Electronics America, Inc., Samsung Electronics Co., Ltd, Samsung
9 Semiconductor, Inc., and Samsung Austin Semiconductor, LLC (collectively “Samsung”), and
10 Intel Corporation (“Intel”). This request is narrowly tailored to protect highly confidential business
11 information.

12 3. **Exhibits D–G, L** to the Declaration of Boris Lubarsky in Support of Applied’s Opposition
13 to Demaray’s Motion to Amend its Complaint. (“Lubarsky Decl.”) include technical specifications,
14 a PVD chamber manual, and Applied’s corporate representative’s testimony, and contain highly
15 confidential Applied business information including details of proprietary reactor technology.

16 4. **Exhibits A–C, J, K** to Lubarsky Decl. are supplemental infringement contentions brought
17 by Demaray in the customer suits in the Western District of Texas and contain highly confidential
18 Intel, Samsung, and Applied business information including details of proprietary reactor
19 technology. Demaray has also designated these exhibits as Highly Confidential under the
20 respective protective orders in the customer suits in the Western District of Texas.

21 5. Applied has invested significant financial and technical resources in developing its
22 proprietary reactor technology and public dissemination of the information could cause Applied,
23 Intel, and Samsung competitive and financial harm by revealing proprietary and confidential
24 information specific to Applied’s, Intel’s, and Samsung’s trade secrets and intellectual property.

25 I declare under penalty of perjury that the foregoing is true and correct.
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LUBARSKY DECL. IN SUPPORT

1 DATED: March 23, 2022

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By: /s/ Boris Lubarsky

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Boris Lubarsky

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LUBARSKY DECL. IN SUPPORT