

# EXHIBIT K

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9 Attorneys for Defendant  
 DEMARAY LLC

10 **UNITED STATES DISTRICT COURT**  
 11 **NORTHERN DISTRICT OF CALIFORNIA**  
 12 **SAN JOSE DIVISION**

14	APPLIED MATERIALS, INC.,	)	Case No. 5:20-cv-09341-EJD-NC
		)	
15	Plaintiff,	)	<b>DECLARATION OF ALEXANDER D.</b>
		)	<b>GLEW</b>
16	vs.	)	
		)	
17	DEMARAY LLC,	)	
		)	
18	Defendant.	)	
		)	
19		)	
		)	

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1 **I. INTRODUCTION**

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

7 **II. BACKGROUND AND QUALIFICATIONS**

8 2. For 34 years, I have been involved with  
9 engineering practice. A large portion of my work has  
10 involved semiconductor fabrication, including product  
11 design, semiconductor device analysis, semiconductor equipment design and analysis, thin film  
12 processing, equipment, characterization, and project development. I was intimately involved in  
13 this field during the time of the patents at issue in this case.

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

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

21 5. I began my career with the plaintiff in this declaratory judgment action, Applied  
22 Materials, Inc., one of the leading companies that supplies equipment for semiconductor  
23 manufacturers. My services to Applied Materials included various engineering roles: product  
24 development, project management, core technology, and supplier quality management. I remained  
25 at Applied Materials for ten years.

26 6. I hold six patents on technologies such as tungsten chemical vapor deposition, and  
27 ultra-high purity and high-temperature valves, and thin film heater and chuck design for  
28



1 processing chambers. I have authored or co-authored over nine articles, presentations, and  
2 seminars on topics including semiconductor thin film processing and diamond like carbon.

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

### 6 **III. PREPARATION AND MATERIALS CONSIDERED**

7 8. In forming my opinions, I have considered the specifications of the patents at issue,  
8 U.S. Patent Nos. 7,544,276 and 7,381,657 (“’276 Patent” and “’657 Patent,” respectively),  
9 including their respective abstracts, figures, and the claim language, as would have been  
10 understood by a person of ordinary skill in the art (“POSITA”). I have also reviewed the file  
11 histories of the ’276 Patent and the ’657 Patent, and the other material cited in this declaration.

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

17 10. Throughout this declaration, I refer to specific portions of the ’276 Patent and the  
18 ’657 Patent and other documents. The citations are intended to be exemplary and are not intended  
19 to convey that the citations are the only source of evidence to support the propositions for which  
20 they are cited.

21 11. I previously submitted a declaration offering my opinions with respect to the ’276  
22 Patent and the ’657 Patent in two other pending litigations: *Demaray LLC v. Intel Corporation*,  
23 6:20-cv-00634-ADA, and *Demaray LLC v. Samsung Electronics Co., LTD et al.*, 6:20-cv-00636-  
24 ADA. The district court in those matters subsequently issued an order regarding claim  
25 construction of the ’276 and ’657 patents. *Demaray LLC v. Intel Corp.*, 6:20-cv-00634-ADA, Dkt.  
26 106 (“Texas Claim Construction”). As detailed below, I agree with all of the conclusions that the  
27 district court reached in that order.

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