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18 Attorneys for Plaintiff  
APPLIED MATERIALS, INC.

19 UNITED STATES DISTRICT COURT  
20 NORTHERN DISTRICT OF CALIFORNIA

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22 APPLIED MATERIALS, INC.,  
23 Plaintiff,  
24 vs.  
25 DEMARAY LLC,  
26 Defendant.

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

**DECLARATION OF AKSHAY S. DEORAS IN SUPPORT OF APPLIED MATERIALS, INC.'S ANSWER, AFFIRMATIVE DEFENSES AND COUNTERCLAIMS TO COUNTERCLAIMS OF DEMARAY LLC**

Honorable Edward J. Davila

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DECLARATION OF AKSHAY S. DEORAS ISO APPLIED

1 I, Akshay S. Deoras, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and am a partner  
3 with the law firm of Kirkland & Ellis, located at 555 California Street, San Francisco, CA 94104.  
4 I am counsel for plaintiff Applied Materials, Inc. (“Applied”) in the above-captioned matter.

5 2. I am over the age of eighteen and suffer from no mental or physical disabilities that  
6 would render me incompetent to testify in this matter. I have knowledge of the facts set forth  
7 herein, and if called to testify as a witness, could do so competently under oath.

8 3. Attached hereto as Exhibit 1 is a true and correct copy of Applied Materials’  
9 Confidential Electra IMP Ta/TaN Chamber Manual, dated July 1998.

10  
11 I declare under perjury under the laws of the United States and the State of California that  
12 the foregoing is true and correct.

13 Executed on September 8, 2022 in San Francisco CA.

14  
15 /s/ Akshay S. Deoras  
16 Akshay S. Deoras  
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DECLARATION OF AKSHAY S. DEORAS ISO APPLIED