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18 APPLIED MATERIALS, INC.

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA

21
22 APPLIED MATERIALS, INC.,

23 Plaintiff,

24 vs.

25 DEMARAY LLC,

26 Defendant.

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

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

Honorable Edward J. Davila

27
28 ADMINISTRATIVE MOTION TO SEAL APPLIED

1 Pursuant to Civil Local Rules 79-5 and 7-11, Plaintiff Applied Materials, Inc. (“Applied”)
2 hereby requests the Court to seal portions of Applied’s Answer, Affirmative Defenses and
3 Counterclaims (“Answer”) to Counterclaims of Demaray LLC (“Demaray”) and exhibits attached
4 thereto, as they contains highly confidential business information relating to Applied’s product
5 details and configurations.

6 In compliance with the applicable rules, Applied requests to file under seal the following
7 portions of its Answer and exhibits attached thereto:

- 8 • Body of Answer: highlighted portions and images on pages 22-25 and 27-31.
- 9 • Exhibit 1 (Applied Materials Electra IMP Ta/TaN Chamber Manual)

10 In support of this Motion, Applied states:

- 11 1. A protective order issued in this action on July 14, 2022. Dkt. 157.
- 12 2. The above exhibit and supporting text contain highly confidential business
13 information including details of proprietary reactor technology. Applied has invested significant
14 financial and technical resources in developing its proprietary reactor technology and public
15 dissemination of the information could cause Applied and its customers competitive and financial
16 harm by revealing proprietary and confidential information specific to Applied’s trade secrets and
17 intellectual property.
- 18 3. Applied is filing herewith the Declaration of Akshay S. Deoras in Support of
19 Applied’s Administrative Motion to File Under Seal and a Proposed Order.

1 DATED: September 8, 2022

Respectfully submitted,

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3 By: /s/ Akshay S. Deoras
Akshay S. Deoras

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