

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

DEMARAY LLC,

Plaintiff,

v.

INTEL CORPORATION

Defendant.

Case No. 6:20-CV-00634-ADA

**JURY TRIAL DEMANDED**

DEMARAY LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD,  
SAMSUNG ELECTRONICS AMERICA, INC.,  
SAMSUNG SEMICONDUCTOR, INC., and  
SAMSUNG AUSTIN SEMICONDUCTOR, LLC

Defendants.

Case No. 6:20-CV-00636-ADA

**JURY TRIAL DEMANDED**

**DECLARATION OF PHILIP OU IN SUPPORT OF DEFENDANTS' CLAIM  
CONSTRUCTION BRIEF REGARDING ADDITIONAL TERMS FOR CLAIM 2 OF U.S.  
PATENT NO. 7,381,657**

I, Philip Ou, hereby declare as follows:

1. I am a partner with the law firm Paul Hastings LLP, counsel for Defendant Intel Corporation ("Intel") and Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., Samsung Austin Semiconductor, LLC ("Samsung"). 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. Attached hereto as **Exhibit A** is a true and correct copy of the hearing transcript for the September 27, 2021 discovery hearing held in the above-captioned matters.

3. Attached hereto as **Exhibit B** is a true and correct copy of U.S. Patent No. 7,381,657.

4. Attached hereto as **Exhibit C** are true and correct excerpts of the file history for U.S. Patent No. 7,381,657.

5. Attached hereto as **Exhibit D** are true and correct excerpts from Demaray LLC's February 5, 2021 infringement contentions against Intel. Given their designation under the Agreed to Protective Order and that they contain Intel confidential information, Exhibit D is only being filed in *Demaray LLC v. Intel Corp.*, Case No. 6:20-cv-634-ADA and is being filed under seal.

6. Attached hereto as **Exhibit E** are true and correct excerpts from Demaray LLC's February 5, 2021 infringement contentions against Samsung. Given their designation under the Agreed to Protective Order and that they contain Samsung confidential information, Exhibit E is only being filed in *Demaray LLC v. Samsung Elecs. Co., Ltd.*, Case No. 6:20-cv-636-ADA and is being filed under seal.

7. Attached hereto as **Exhibit F** is a true and correct copy of a document prepared for demonstrative purposes depicting a timeline of true and correct excerpts of the file history for U.S. Patent No. 7,381,657.

DATED: December 10, 2021

By: /s/ Philip Ou

Philip Ou