

**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

STATUS REPORT REGARDING MOTION FOR INTER-DISTRICT TRANSFER

Pursuant to the Court's March 23, 2021 Standing Order Regarding Motion for Inter-District Transfer, Defendants Intel Corporation ("Intel") and Samsung Electronics Co., LTD, Samsung Electronics America, Inc., Samsung Semiconductor, Inc. and Samsung Austin Semiconductor LLC ("Samsung") in the above captioned cases respectfully submit the following status report regarding their pending motions to transfer to the Northern District of California.

Defendants filed motions to transfer on November 6, 2020. Plaintiff, Demaray LLC ("Demaray") thereafter sought venue discovery from Defendants through both interrogatories

and deposition notices. On December 12, 2020, Plaintiff also served subpoenas on non-party, Applied Materials, Inc. (“Applied”), the supplier of the equipment used by Defendants that is accused of infringement in these cases.

Plaintiff completed its venue discovery after concluding the deposition of Applied on February 9, 2021 and filed responsive briefs to the motions to transfer on February 23, 2021. Defendants also sought venue discovery from Demaray, which was the subject of two discovery hearings, the first on March 4, 2021 and the second on March 17, 2021. After the Court ordered a second deposition of Demaray to answer questions its corporate representative was instructed not to answer, Defendants completed the deposition and venue discovery on March 23, 2021. The parties agree the deadline for Defendants to file their reply briefs to the motions to transfer is March 30, 2021. Contemporaneously with the filing of this status report, Defendants are filing Requests for Oral hearing on their motions to transfer pursuant to Local Rule CV-7(h).

On March 24, 2021, the Court issued orders cancelling the *Markman* hearing, 6:20-cv-634, Dkt. No. 67; 6:20-cv-636, Dkt. No. 84, set for April 6, 2021.

Dated: March 26, 2021

By: /s/ Yar R. Chaikovsky

By: /s/ Yar R. Chaikovsky

Brian C. Nash
Texas Bar No. 24051103
Brian.nash@pillsburylaw.com
PILLSBURY WINTHROP SHAW
PITTMAN LLP
401 Congress Ave., Suite 1700
Austin, Texas 78701-3797
Phone: (512) 580-9629
Fax: (512) 580-9601

Yar R. Chaikovsky
yarchaikovsky@paulhastings.com
Philip Ou
philipou@paulhastings.com
Allan M. Soobert
allansoobert@paulhastings.com
Joseph J. Rumpler, II
josephrumpler@paulhastings.com
PAUL HASTINGS LLP
1117 S. California Avenue
Palo Alto, California 94304-1106
Telephone: 1(650) 320-1800
Facsimile: 1(650) 320-1900

John M. Desmarais (*pro hac vice*)
jdesmarais@desmaraisllp.com
Yung-Hoon Ha (*pro hac vice*)
yha@desmaraisllp.com
Cosmin Maier (*pro hac vice*)
cmaier@desmaraisllp.com
Christian Dorman (*pro hac vice*)
cdorman@desmaraisllp.com
DESMARAIS LLP
230 Park Avenue, 26th Floor
New York, NY 10169
Tel: (212) 351-3400
Fax: (212) 351-3401

Attorney for Samsung Defendants

J. Stephen Ravel
Texas State Bar No. 16584975
steve.ravel@kellyhart.com
KELLY HART & HALLMAN LLP
303 Colorado, Suite 2000
Austin, Texas 78701
Tel: (512) 495-6429

Yar R. Chaikovsky
yarchaikovsky@paulhastings.com
Philip Ou
philipou@paulhastings.com
Allan M. Soobert
allansoobert@paulhastings.com
Joseph J. Rumpler, II
josephrumpler@paulhastings.com
PAUL HASTINGS LLP
1117 S. California Avenue
Palo Alto, California 94304-1106
Telephone: 1(650) 320-1800
Facsimile: 1(650) 320-1900

Sonal N. Mehta (*pro hac vice*)
Sonal.Mehta@wilmerhale.com
WILMER CUTLER PICKERING HALE AND
DORR LLP
2600 El Camino Real, Suite 400
Palo Alto, CA 94306
Tel.: (650) 858-6000
Fax: (650) 858-6100

Claire M. Specht (*pro hac vice*)
Claire.Specht@wilmerhale.com
WILMER CUTLER PICKERING HALE AND
DORR LLP
60 State Street
Boston, MA 02109
Tel.: (617) 526-6000
Fax: (617) 526-5000

Attorneys for Intel Corporation

CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing via electronic mail to all counsel of record.

/s/ Yar R. Chaikovsky

Yar R. Chaikovsky