

EXHIBIT 25

**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 (A
KOREAN COMPANY), SAMSUNG
ELECTRONICS AMERICA, INC.,
SAMSUNG SEMICONDUCTOR, INC.,
and SAMSUNG AUSTIN
SEMICONDUCTOR, LLC,**

Defendants.

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

JURY TRIAL DEMANDED

PLAINTIFF DEMARAY LLC'S PROPOSED CONSTRUCTIONS

Pursuant to the Court's scheduling order, Plaintiff Demaray LLC ("Demaray") hereby provides for exchange with the above-captioned Defendants (collectively, "Defendants") a preliminary list of Demaray's current proposed constructions of certain terms of U.S. Patent Nos. 7,544,276 and 7,381,657.

The inclusion of any claim terms, phrases, or clauses herein is not intended to mean, and should not be construed to mean, that any such terms, phrases, or clauses have a special or uncommon meaning. This disclosure is preliminary and Demaray expressly reserves the right to supplement, revise, modify, and/or otherwise finalize the below lists of proposed terms and associated proposed constructions based upon additional information or analyses, information learned through the course of discovery or otherwise, or in response to the terms, claim elements, and/or constructions proposed by Defendants. Demaray reserves the right to argue that Defendants' proposed constructions are incorrect, to propose alternative constructions to any constructions proposed by Defendants, and/or to argue that any terms (either on Defendants' or Demaray's lists) should not be construed. Further, as discovery is ongoing, Demaray reserves the right to supplement and/or amend its proposed terms and/or preliminary claim constructions.

Demaray expressly reserves the right to rely upon any and all intrinsic evidence in support of its preliminary claim constructions. Demaray further reserves the right to rely upon any and all extrinsic evidence, including, by way of example and without limitation, the right to rely upon the opinions and testimony of experts and/or the testimony of one or more of the individuals named as inventors of the respective patents. Demaray further reserves the right to rely upon any intrinsic or extrinsic evidence cited by Defendants in support of their claim construction positions.

I. PROPOSED CONSTRUCTIONS

Proposed Terms	Proposed Constructions
A method of depositing a film on an insulating substrate, comprising	If limiting, plain and ordinary meaning or “A method of depositing a film on a substrate providing electrical insulation, comprising”
“pulsed DC power supply”	Plain and ordinary meaning or “supply for providing direct current power that oscillates between positive and negative voltages”
“pulsed DC power”	Plain and ordinary meaning or “direct current power that oscillates between positive and negative voltages”
“narrow band-rejection filter”	Plain and ordinary meaning or “filter that passes all of the frequencies of the power supply except within a narrow band”
“reconditioning the target”	Plain and ordinary meaning or “cleaning and conditioning the target”
“metallic mode”	“mode of operation in which the surface of the target is substantially metallic”
“poison mode”	“mode of operation in which the rate of the thin film formation on the surface of the target equals or exceeds the rate of sputter removal of the surface of the target”

“substrate”	Plain and ordinary meaning or “material that provides the surface on which something is deposited or inscribed, for example a silicon wafer used to manufacture integrated circuits”
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