

**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

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Court's Order Governing Proceedings – Patent Case, Plaintiff Demaray LLC, Defendant Intel Corporation and Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, LLC (collectively, "Defendants") respectfully submit this joint claim construction statement in the

above-captioned cases. The claim terms identified below are found in U.S. Patent Nos. 7,381,657 (the “’657 Patent”) and 7,544,276 (the “’276 Patent”).

I. DISPUTED CONSTRUCTIONS

Claim Term	Proposed By	Plaintiff’s Proposal	Defendants’ Proposal
“Substrate” (’657 Patent, cls. 1, 2, 7, 11; ’276 Patent, cls. 1, 2, 6, 10)	Defendants	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”	“base support structure” or “base support structure that provides the surface on which something is deposited, for example the entirety of a wafer and all layers on that wafer”
“A method of depositing a film on an insulating substrate, comprising” (’657 Patent, cl. 1)	Defendants	Preamble is not limiting	Preamble is limiting. “insulating substrate” means “insulating [substrate]”
“Providing pulsed DC power” (’657 Patent, cls. 1, 2, 11)	Defendants	Plain and ordinary meaning, or “pulsed DC power” means “direct current power that oscillates between positive and negative voltages”	“providing DC power in the form of a square wave at a set frequency, reverse time, and amplitude”
“Pulsed DC power supply” (’276 Patent, cls. 1, 6)	Defendants	Plain and ordinary meaning, or “supply for providing [pulsed DC power]”	“power supply, which provides DC power in the form of a square wave at a set frequency, reverse time, and amplitude”
“Narrow band rejection filter” (’657 Patent, cls. 1, 2, 20; ’276 Patent, cls. 1, 6)	Defendants	Plain and ordinary meaning, or “filter which rejects a narrow band of frequencies”	“filter which rejects a narrow band of frequencies (but passes [substantially] all frequencies outside of the narrow band)” or “filter that rejects a narrow band of frequencies centered on one RF bias frequency”
“Reconditioning the target”	Defendants	Plain and ordinary meaning,	“conditioning the target between depositions”

('657 Patent, cl. 1)		or “cleaning and conditioning the target”	
(a) “Metallic mode” (‘657 Patent, cls. 1, 2) (b) “Poison mode” (‘657 Patent, cls. 1, 2)	Plaintiff	(a): “mode of operation in which the surface of the target is substantially metallic” (b): “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”	Plain and ordinary meaning for each
“the temperature of the substrate substantially constant” (‘657 Patent, cl. 7; ‘276 Patent, cl. 10)	Defendants	Plain and ordinary meaning, or “substantially constant” means “within about 10°C”	“the substrate temperature to be within about 10 °C of the set temperature”

Dated: April 1, 2021

/s/ C. Maclain Wells

By: C. Maclain Wells

Richard D. Milvenan
State Bar No. 14171800
Travis C. Barton
State Bar No. 00790276
McGINNIS LOCHRIDGE LLP
600 Congress Ave., Suite 2100
Austin, Texas 78701
Telephone: (512) 495-6005
Facsimile: (512) 505-6305
rmilvenan@mcginnislaw.com
tcbarton@mcginnislaw.com

Morgan Chu (*pro hac vice*)
Benjamin W. Hattenbach (*pro hac vice*)
Annita Zhong (*pro hac vice*)
C. Maclain Wells (*pro hac vice*)
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067
Telephone: (310) 277-1010
Facsimile: (310) 203-7199

mchu@irell.com
bhattenbach@irell.com
azhong@irell.com
mwells@irell.com

Darish Huynh (*pro hac vice*)
IRELL & MANELLA LLP
840 Newport Center Drive, Suite 400
Newport Beach, CA 92660
Telephone: (949) 760-0991
Facsimile: (949) 760-5200
dhuyh@irell.com
Attorneys for Demaray LLC

Dated: April 1, 2021

By: /s/ Philip Ou

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

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