

Exhibit 5

1 UNITED STATES DISTRICT COURT
2 FOR THE
3 DISTRICT OF NEW MEXICO

4 No. 10-CV-01077

5 STC.UNM

Plaintiff,

6 vs.

7 INTEL CORPORATION

Defendant,

COPY

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11 Videotaped Deposition of SALEEM HUSSAIN ZAIDI, Ph.D.

12

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May 5, 2011

8:00 a.m.

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201 Third Street N.W., Suite 1800
Albuquerque, New Mexico

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PURSUANT TO THE APPLICABLE RULES OF CIVIL

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PROCEDURE this deposition was:

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TAKEN BY: BRIAN L. FERRALL
Attorney for Intel

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Reported by: Marcia J. Schick, CM
Hughes Southwest Court Reporters
110 2nd Street S. W. Suite 505
Albuquerque, New Mexico 87102

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1 Q You can answer if you can.

2 A I have, yes.

3 Q What sort of devices?

4 A This is shot key barriers.

5 Q Shot key, okay?

6 A Yeah.

7 Q Anything else?

8 A Diodes.

9 Q Anything else?

10 A That is my best recollection.

11 Q During your time at UNM, have you ever

12 created any working integrated circuit?

13 A No.

14 MR. FERRALL: Let's mark this as the next

15 exhibit.

16 (Exhibit No. 35 - STC's Responses to Intel.)

17 Q We have marked as 35 a document that is

18 entitled STC's Responses to Intel Corporation's

19 Second Set of Interrogatories. You see that?

20 A Yes.

21 Q Have you ever seen this document?

22 A Yes.

23 Q Did you provide some information for these

24 responses?

25 A I believe this information came from the

1 A I have to go into some of the paper we
2 explain that. You know the difference between
3 linear and nonlinear. Linear is just straight line
4 and so resist as a function of intensity has some
5 nonlinear behavior. That is what it is saying.

6 Q You don't claim to have developed resist
7 with nonlinear properties yourself?

8 A Good God, no.

9 Q That existed long before you came to CHTM;
10 right?

11 A That is the gift of people who made the
12 resist, yes.

13 Q When you use the term here higher
14 harmonics, is that the same as higher spatial
15 frequencies.

16 A I believe so.

17 Q So, am I right, then, that the
18 nonlinearities of resist can itself provide for
19 higher spatial frequencies in a pattern?

20 MR. VOGT: Object; lack of foundation.

21 A If you go back to the previous one, it
22 says, nonlinearities add higher harmonics but cannot
23 provide denser patterns. So, you cannot extend --
24 you cannot change the period with nonlinearity.

25 Q Right. But my point is the nonlinearities

1 of resist cannot provide a denser pattern but it can
2 add --

3 A Spatial frequencies, yes. That is what
4 the square pattern shows, yeah.

5 Q So, now, if you can go, I think, two pages
6 forward to the page ending in 9027.

7 A Okay.

8 Q And the last main bullet point lists two
9 examples; right?

10 A Uh-huh. Yeah. Okay.

11 Q So, let's take those one at a time. The
12 first one says "Add patterns in sacrificial layer,
13 (spatial frequency multiplication.)"

14 A This is talking about additional spatial
15 frequencies in a sacrificial layer.

16 Q Sacrificial layer being, for example, a
17 layer of silicon dioxide?

18 A Silicon nitride, yes.

19 Q What is meant by spatial frequency
20 multiplication?

21 A I don't remember. The terminologies are
22 different. It has been such a long time. Some
23 people call it doubling. Some people call it
24 extension, multiplication. If I have to say
25 anything, I'll just say that it means you can add