

# 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