

Exhibit D

*INTEL CORPORATION'S AMENDED RESPONSES TO PLAINTIFF STC.UNM'S
FIRST SET OF REQUESTS FOR PRODUCTION NOS. 1-19*

UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

STC.UNM,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

Civil No. 1:10-cv-01077-RB-WDS

**INTEL CORPORATION'S AMENDED RESPONSES TO PLAINTIFF
STC.UNM'S FIRST SET OF REQUESTS FOR PRODUCTION NOS. 1-19**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Local Rules of Civil Procedure of this Court, Defendant Intel Corporation (“Intel”) hereby responds to Plaintiff STC.UNM’s (“Plaintiff”) First Set of Requests for Production Nos. 1-19 (“Requests”).

RESERVATION OF RIGHTS

Intel’s responses to Plaintiff’s Requests shall not constitute an admission by Intel that any of the Requests, any of Intel’s responses, or any documents or things produced in connection therewith, are admissible as evidence in any trial or other proceeding. Intel reserves the right to object on any grounds, at any time, to the admission of any Request or any objection, response, or any document or thing produced in connection therewith in any such trial or other proceeding.

GENERAL OBJECTIONS

1. Intel hereby incorporates by reference the “General Objections” set forth in its Responses and Objections to Plaintiff STC.UNM’s First Set of Interrogatories Nos. 1-21 to Defendant Intel (“Interrogatories”) and all supplements thereto as if fully set forth herein.

responses, Intel will construe “Accused Products” as being limited to microprocessor semiconductors manufactured with Intel’s 22 nm, 32 nm, and 45nm technologies.

Intel objects to Plaintiff’s Requests as a whole on each of the above grounds. Insofar as Plaintiff’s Requests seek documents or information to which any of the above Reservation of Rights and/or General Objections apply, Intel hereby incorporates such Reservation of Rights and/or General Objections into its specific responses to such requests. Accordingly, the failure to note any general objection in any specific response above shall not be a waiver of such objection with respect to any request.

SPECIFIC OBJECTIONS

REQUEST NO. 1:

All process flow documents used in the manufacture of each Accused Product.

RESPONSE TO REQUEST NO. 1:

Intel objects that this request seeks is overbroad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence. Intel further objects that the term “process flow documents” is vague and ambiguous.

Subject to, and without waiving its general and specific objections, Intel will produce documents sufficient to show where in its 22 nm, 32 nm, and 45nm manufacturing processes it uses double patterning for representative products.

REQUEST NO. 2:

All GDS/GDS II files (or their equivalent) for the lithographic methods used in the manufacture of each Accused Product.

RESPONSE TO REQUEST NO. 2:

Intel objects that this request seeks is overbroad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence.

Subject to, and without waiving its general and specific objections, Intel will produce GDS/GDS II files (or their equivalent) sufficient to show its use of double

patterning for representative products on its 22 nm, 32 nm, and 45 nm manufacturing processes.

REQUEST NO. 3:

All documents sufficient to show and explain the meaning of the designations, including internal names, code names, product names and project names, alphanumeric or otherwise, used to refer to each Accused Product.

RESPONSE TO REQUEST NO. 3:

Intel objects that this request is overbroad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 4:

All documents sufficient to show and explain the meaning of the designations, including internal names, code names, product names and project names, alphanumeric or otherwise, used to refer to each lithography process and/or lithography process flow used in the manufacture of each Accused Product.

RESPONSE TO REQUEST NO. 4:

Intel objects that this request is overbroad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving its general and specific objections, Intel will produce documents sufficient to identify the code names of its 22 nm, 32 nm, and 45 nm process technology.

REQUEST NO. 5:

All articles, press releases, and press kits (as that term is used by Intel on its web site) concerning Intel's 45nm process technology, 32nm process technology, 22nm process technology, 15nm process technology, and 11nm process technology.