

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ELM 3DS INNOVATIONS, LLC, Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD., et al., Defendants.	C.A. No. 14-cv-1430-LPS-CJB JURY TRIAL DEMANDED
ELM 3DS INNOVATIONS, LLC, Plaintiff, v. MICRON TECHNOLOGY, INC., et al., Defendants.	C.A. No. 14-cv-1431-LPS-CJB JURY TRIAL DEMANDED
ELM 3DS INNOVATIONS, LLC, Plaintiff, v. SK HYNIX INC., et al., Defendants.	C.A. No. 14-cv-1432-LPS-CJB JURY TRIAL DEMANDED

PLAINTIFF’S COMMENTS ON DEFENDANTS’ TECHNOLOGY TUTORIAL

The Defendants’ technology tutorial is argumentative and thus contrary to the Court’s Scheduling Orders. For example, the discussion of “Stacking/Vertical Bonding” (beginning at 12:38 in the tutorial) is a graphical version of the arguments the Defendants present in their brief. The tutorial makes argumentative conclusions about the scope of the claims, invention, and specification. (At 4:40, 14:30, 15:40, 16:40). In addition, the tutorial limits the scope of the

invention with respect to manufacturing and wafer thinning. (e.g., at 12:15 in the tutorial). Elm addresses these arguments in its briefing and will not repeat those arguments here. But Elm objects to the Defendants' use of the technology tutorial to rehash the arguments they make in their briefs.

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Respectfully submitted,

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