

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

**STIPULATION AND [PROPOSED] ORDER AMENDING SCHEDULING ORDER**

WHEREAS, the Court entered an Amended Scheduling Order on May 9, 2018 (D.I. 176 (C.A. No. 14-1430-LPS));

WHEREAS, the Court has not set the dispositive motion hearing, pretrial conference or trial date in the above cases;

WHEREAS, the parties seek additional time to complete their document productions and to adjust the subsequent dates in the Scheduling Order;

NOW, THEREFORE, the parties agree to amend the Scheduling Order as follows:

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Deadline to serve Document Requests		2/9/20
Substantial completion of document production; exchange of privilege logs	1/9/20	3/31/20
Deadline to serve Interrogatories, Requests for Admission, and 30(b)(6) deposition notices		4/24/20
Deadline to serve all other fact deposition notices		6/12/20
Fact discovery closes	45 days after CC Order	7/27/20
Elm elects no more than 36 total claims and provides final infringement contentions	60 days after CC Order	8/17/20
Defendants elect no more than 36 prior art references and provide final invalidity contentions	90 days after CC Order	9/16/20
Opening expert reports	30 days after final invalidity contentions	11/9/20
Responsive expert reports	30 days after opening Reports	12/9/20
Expert discovery closes	45 days after responsive Reports	1/25/21
Case dispositive and <i>Daubert</i> motions	28 days after expert discovery closes	2/22/21
Responses to case dispositive and <i>Daubert</i> motions	14 days after motions filed	3/15/21
Replies to case dispositive and <i>Daubert</i> motions	7 days after responses filed	3/22/21

All other provisions of the Scheduling Order shall remain in full force and effect.

Dated: January 10, 2020

Farnan LLP

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Respectfully submitted,

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Manufacturing America Inc., and SK Hynix  
Memory Solutions Inc.*

IT IS SO ORDERED.

Date: \_\_\_\_\_

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The Honorable Leonard P. Stark