



January 31, 2020

Via E-Filing

The Honorable Leonard P. Stark
J. Caleb Boggs Federal Building
844 N. King Street
Room 6124, Unit 26
Wilmington, DE 19801-3556

Re: *Elm 3DS Innovations, LLC v. Samsung Elecs. Co. Ltd., et al.*,
C.A. No. 14-cv-1430-LPS

Dear Chief Judge Stark,

The parties in the above-referenced matter write to request the scheduling of a discovery teleconference.

The following attorneys participated in a verbal meet and confer by telephone on December 18, 2019:

Delaware Counsel for Elm: Michael Farnan
Lead Counsel for Elm: Nosson Knobloch
Delaware Counsel for Samsung: Adam Poff
Lead Counsel for Samsung: Phillip Citroen, Soyoung Jung and Allan Soobert

In addition, the following attorneys participated in a verbal meet and confer by telephone on December 13, 2019:

Delaware Counsel for Elm: Michael Farnan
Lead Counsel for Elm: Nosson Knobloch
Delaware Counsel for Samsung: Adam Poff
Lead Counsel for Samsung: Soyoung Jung and Allan Soobert

In addition, the following attorneys participated in a verbal meet and confer by telephone on December 9, 2019:

Delaware Counsel for Elm: Brian Farnan
Lead Counsel for Elm: Nosson Knobloch
Delaware Counsel for Samsung: Adam Poff
Lead Counsel for Samsung: Soyoung Jung and Phillip Citroen

In addition, the following attorneys participated in a verbal meet-and-confer by telephone on October 24, 2019:

Lead Counsel for Elm: Nosson Knobloch
Lead Counsel for Samsung: Soyoung Jung and Phillip Citroen

919 N. MARKET STREET, 13TH FLOOR, WILMINGTON, DE 19801

The following attorneys also participated in a verbal meet-and-confer by telephone on September 3, 2019:

Delaware Counsel for Elm: Michael Farnan
Lead Counsel for Elm: Nosson Knobloch
Delaware Counsel for Samsung: Adam Poff
Lead Counsel for Samsung: Soyoung Jung and Phillip Citroen

The above-named attorneys have also exchanged numerous emails and letters addressing these issues.

There are three disputes requiring judicial attention:

1. Samsung's November 15, 2019 Objections and Responses to Elm's Third Set of Common Interrogatories, and Elm's efforts to obtain discovery about Samsung's US and worldwide revenue.
2. Samsung's December 5, 2019 Objections and Responses to Elm's Fourth Set of Interrogatories to Samsung, and Elm's efforts to obtain discovery about Samsung's revenue for components manufactured in or supplied from the United States.
3. Whether issues 1 and 2 are mooted by Samsung's commitment to produce the data and information responsive to them by no later than February 14.

Respectfully submitted,

/s/ Brian E. Farnan

Brian E. Farnan

cc: Counsel of Record (via E-File)