

Exhibit A

**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 ELM 3DS'S THIRD SET OF COMMON INTERROGATORIES

Under Federal Rules of Civil Procedure 26 and 33, Plaintiff Elm 3DS Innovations, LLC (“Elm 3DS”) requests that Defendants answer the following interrogatories in writing, under oath, and serve a copy of the answers upon Bartlit Beck LLP, 1801 Wewatta Street, Suite 1200, Denver, CO 80202 within 30 days of service of these interrogatories. These interrogatories are continuing in nature and must be supplemented or corrected, or both, in a timely manner.

DEFINITIONS

1. The term “Elm 3DS” refers to the Plaintiff in these actions and all parents, subsidiaries, affiliates, assignees, predecessors, employees, and agents thereof.
2. The term “Elm 3DS Patents” refers to the asserted patents in these actions.
3. The terms “you” and “your” mean the Defendants in these actions and their parents, subsidiaries, divisions, affiliates, predecessors, assignees, successors, and acquired assets of business

units, and any of their present or former officers, directors, trustees, employees, agents, representatives, attorneys, patent agents, and all other persons acting on their behalf.

4. The term “Accused Products” means the stacked memory products identified in Elm 3DS’s infringement contentions on November 2, November 17, and November 20, 2015, and May 23, 2018, and all products sold by Defendants that include at least one stacked memory product, including but not limited to SSDs, memory modules, USB flash drives, chipsets, and end-user devices.

5. The terms “Product” and “Products” mean stacked semiconductor products, including but not limited to stacked memory products.

INSTRUCTIONS

1. *Lost or Destroyed Documents:* If any document or tangible thing for which identification is requested was formerly in existence or in your possession but no longer exists, or no longer is within your possession, custody or control, your response should state, for each such document or thing: (a) an identification of the document or thing and, if a document, its author and addressee; (b) the date and circumstances of such loss or destruction; and (c) the reason or justification for such loss or destruction.

2. *Documents for Which a Privilege Is Claimed:* To the extent of any claim that any information or document is privileged or in any other way free from discovery under the Federal Rules of Civil Procedure, you are requested, in lieu of producing said information or document, to produce a description of the information or document sufficient to allow Elm 3DS a specific understanding of the nature of the objection; and if a document, the identification of the author, the date of the document, the addressee(s), the person(s) who received copies of the document, and the general subject matter of the document.

3. *Ongoing Duty to Supplement:* Pursuant to Federal Rule of Civil Procedure 26(e), you are required to supplement your response to include further information that may become available after the date of your response to these interrogatories.

INTERROGATORIES

4. For any Product made or sold by you that contains a semiconductor layer that is 50 microns or less, identify on a worldwide, product-by-product basis the monthly revenue and profit from 2008 through 2018.

5. For any Product made or sold by you that contains a semiconductor layer that is 50 microns or less, identify on a product-by-product basis the monthly revenue and profit from 2008 through 2018 for Products manufactured, sold, offered for sale, or imported into the United States.

June 24, 2019

Respectfully submitted,

/s/ Michael J. Farnan

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