

Exhibit 1

Jung, Soyoung

From: Citroen, Phillip W.
Sent: Friday, February 14, 2020 11:47 AM
To: Nosson Knobloch; Jung, Soyoung; apoff@ycst.com; ServicePH Samsung-ELM 3DS; Soobert, Allan M.
Cc: Mailing List - Leedy; Michael J. Farnan; Brian Farnan
Subject: RE: Draft Letter to Judge Hall

Nosson,

The correct number is SAMSUNG-ELM-000062368.

Regards,
Phillip

From: Nosson Knobloch <nosson.knobloch@bartlitbeck.com>
Sent: Friday, February 14, 2020 12:56 PM
To: Jung, Soyoung <soyoungjung@paulhastings.com>; apoff@ycst.com; ServicePH Samsung-ELM 3DS <ServicePHSamsung-ELM3DS@paulhastings.com>; Soobert, Allan M. <allansoobert@paulhastings.com>; Citroen, Phillip W. <phillipcitroen@paulhastings.com>
Cc: Mailing List - Leedy <leedy@bartlit-beck.com>; Michael J. Farnan <mfarnan@farnanlaw.com>; Brian Farnan <bfarnan@farnanlaw.com>
Subject: [EXT] RE: Draft Letter to Judge Hall

Soyoung,

Item 3, below, identifies SAMSUNG-ELM-0000628 as containing transfer prices. After looking at that bates number, I believe this was a typo. Can you please let me know what bates number you intended to identify?

Thanks,

-Nosson

BartlitBeck LLP

Nosson D. Knobloch | p: 303.592.3122 | c: 773.301.2851 | Nosson.Knobloch@BartlitBeck.com | 1801 Wewatta Street, 12th Floor, Denver, CO 80202

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From: Jung, Soyoung <soyoungjung@paulhastings.com>
Sent: Thursday, February 13, 2020 12:35 PM
To: Nosson Knobloch <nosson.knobloch@bartlitbeck.com>; apoff@ycst.com; ServicePH Samsung-ELM 3DS <ServicePHSamsung-ELM3DS@paulhastings.com>; Soobert, Allan M. <allansoobert@paulhastings.com>; Citroen, Phillip W. <phillipcitroen@paulhastings.com>
Cc: Mailing List - Leedy <leedy@bartlit-beck.com>; Michael J. Farnan <mfarnan@farnanlaw.com>; Brian Farnan

<bfarnan@farnanlaw.com>

Subject: RE: Draft Letter to Judge Hall

Nosson,

You have now received Samsung's productions of:

1. worldwide sales for the memory products (SAMSUNG-ELM-000062369);
2. worldwide sales for the image sensor products (SAMSUNG-ELM-000062370);
3. transfer prices (SAMSUNG-ELM-0000628);
4. sales data for downstream products containing third-party components (SAMSUNG-ELM-000062371);
5. correlations of downstream products to third-party memory/image sensor components (SAMSUNG-ELM-000062372); and
6. correlations of downstream products to Samsung memory/image sensor products (SAMSUNG-ELM-000062373).

Samsung is currently finalizing the data it has compiled on SAS wafer sales, and we expect to produce this last remaining item to you by Friday or early next week.

These productions moot any need for Elm's motion. Therefore, please confirm that Elm will withdraw its motion so that the parties can avoid burdening the Court with an entirely unnecessary dispute.

Regards,
Soyoung

From: Nosson Knobloch <nosson.knobloch@bartlitbeck.com>

Sent: Thursday, February 6, 2020 2:02 PM

To: apoff@ycst.com; ServicePH Samsung-ELM 3DS <ServicePHSamsung-ELM3DS@paulhastings.com>; Jung, Soyoung <soyoungjung@paulhastings.com>; Soobert, Allan M. <allansoobert@paulhastings.com>; Citroen, Phillip W. <phillipcitroen@paulhastings.com>

Cc: Mailing List - Leedy <leedy@bartlit-beck.com>; Michael J. Farnan <mfarnan@farnanlaw.com>; Brian Farnan <bfarnan@farnanlaw.com>

Subject: [EXT] Draft Letter to Judge Hall

Counsel:

Per Judge Hall's Order, D.I. 247, we've attached a draft letter setting-forth the dates that we are available for a discovery teleconference. Please let us know if you have any edits to the letter. And, if any of these dates do not work for you, please let us know what other dates you're available.

Thanks,

-Nosson

BartlitBeck LLP

Nosson D. Knobloch | p: 303.592.3122 | c: 773.301.2851 | Nosson.Knobloch@BartlitBeck.com | 1801 Wewatta Street, 12th Floor, Denver, CO 80202

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Exhibit 2

PAUL
HASTINGS

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1(213) 683-6211
soyoungjung@paulhastings.com

December 12, 2019

VIA E-MAIL

Nosson Knobloch
Bartlit Beck LLP
1801 Wewatta, Suite 1200
Denver, CO 80202

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

Dear Nosson:

This letter responds to your correspondence of December 10, and our teleconferences on December 9 and 10. Samsung's proposal for the discovery we discussed is set forth below.

I. Downstream Products

Samsung agrees to produce U.S. sales data for all downstream products that include: (1) relevant memory components, and (2) relevant image sensor components. Samsung anticipates producing the corresponding sales data for these products from both SEA and SELA-Miami, by **January 10**. Samsung is endeavoring to produce this data earlier, but given the anticipated business shutdowns from the upcoming holidays, and the large volume of products at issue, Samsung estimates January 10 as a more feasible date of production.

II. Worldwide Sales Data

A. U.S. Sales Activities

Samsung agrees to produce worldwide sales data for the relevant products (*e.g.*, stacked products including at least one die that is 50 microns or less) arising from sales-related activities conducted by any Samsung defendant in the U.S. To the extent not already produced, Samsung proposes producing this data to Elm by **January 24**.

B. Image Sensor Products Incorporating SAS Wafers

Samsung agrees to produce worldwide sales data for the relevant image sensor products incorporating wafers manufactured at SAS. Samsung proposes producing this data to Elm by **January 10**.

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