

**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 Amended Scheduling Orders on May 9, 2018 (D.I. 176 (C.A. No. 14-1430-LPS)) and January 15, 2020 (Docket Text Order);

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

WHEREAS, the Defendants have requested additional time to complete discovery in

this case due to the COVID-19 pandemic;

WHEREAS, the CDC issued a Level 3 warning recommending the avoidance of all nonessential travel to South Korea, where the headquarters of Defendants Samsung and SK Hynix are located; and

WHEREAS, the parties agree to meet and confer in good faith as the case progresses to determine whether further extensions may be needed;

NOW, THEREFORE, the parties agree to amend the Scheduling Order as set forth in Exhibit A to account for the on-going pandemic.

Dated: March 24, 2020

Farnan LLP

/s/ Michael J. Farnan

Brian E. Farnan (#4089)
Michael J. Farnan (#5165)
919 North Market Street
12th Floor
Wilmington, DE 19801
(302) 777-0300
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

*Attorneys for Plaintiff Elm 3DS
Innovations, LLC*

Young Conaway Stargatt & Taylor, LLP

/s/ Pilar G. Kraman

Adam W. Poff (#3990)
Pilar G. Kraman (#5199)
Rodney Square
1000 North King Street
Wilmington, DE 19801
Telephone: (302) 571-6600
apoff@ycst.com
pkraman@ycst.com

*Attorneys For Defendants Samsung
Electronics Co., Ltd., Samsung Semiconductor,
Inc., Samsung Electronics America, Inc., and
Samsung Austin Semiconductor, LLC*

Respectfully submitted,

Richards Layton & Finger

/s/ Frederick L. Cottrell, III

Frederick L. Cottrell, III (#2555)
Travis S. Hunter (#5350)
Tyler E. Cragg (#6398)
One Rodney Square
920 North King Street
Wilmington, DE 19801
(302) 651-7836
cottrell@rlf.com
hunter@rlf.com
cragg@rlf.com

*Attorneys for Defendants
Micron Technology, Inc., Micron
Semiconductor Products, Inc. and Micron
Consumer Products Group, Inc.*

GREENBERG TRAURIG, LLP

/s/ Benjamin J. Schladweiler

Benjamin J. Schladweiler (#4601)
The Nemours Building
1007 North Orange Street, Suite 1200
Wilmington, DE 19801
(302) 661-7352
schladweilerb@gtlaw.com

*Attorneys for Defendants SK Hynix Inc., SK
Hynix America Inc., Hynix Semiconductor
Manufacturing America Inc., and SK Hynix
Memory Solutions Inc.*

IT IS SO ORDERED.

Date: _____

The Honorable Leonard P. Stark

Exhibit A

Joint Proposed Case Schedule

Event	Current Deadline	Extended Deadline
Substantial completion of document production; exchange of privilege logs	3/31/2020	6/29/2020
Deadline to serve interrogatories, requests for admission, and Rule 30(b)(6) deposition notices	4/24/2020	7/23/2020
Deadline to serve all other fact deposition notices	6/12/2020	9/10/2020
Fact discovery closes	7/27/2020	10/26/2020
Elm elects no more than 36 total claims and provides final infringement contentions	8/17/2020	11/16/2020
Defendants' responses to contention interrogatories related to infringement	21 days after Markman order	12/7/2020
Defendants elect no more than 36 prior art references and provide final invalidity contentions	9/16/2020	12/15/2020
Elm's responses to contention interrogatories related to invalidity	21 days after Markman order	1/5/2021
Opening expert reports	11/9/2020	2/8/2021
Responsive expert reports	12/9/2020	3/9/2021
Expert discovery closes	1/25/2021	4/26/2021
Case dispositive and Daubert motions	2/22/2021	5/24/2021
Responses to case dispositive and Daubert motions	3/15/2021	6/14/2021
Replies to case dispositive and Daubert motions	3/22/2021	6/21/2021
Hearing on pending dispositive and Daubert motions	TBD	TBD
Rule 16 Conference	TBD	TBD
Deadline for Elm to provide a draft pretrial order to all other parties	30 days before the pretrial order is to be filed with the Court	30 days before the pretrial order is to be filed with the Court
Deadline for all other parties to provide Elm and each other party with their responses to Elm's draft order	14 days before the pretrial order is to be filed with the Court	14 days before the pretrial order is to be filed with the Court
Deadline for the parties to file a joint proposed statement setting forth their positions regarding trial sequencing and scheduling	Third business day before the date of the Pretrial Conference (6 p.m. ET)	Third business day before the date of the Pretrial Conference (6 p.m. ET)
Pretrial conference	TBD	TBD
First jury trial (second and third jury trial to be determined by the Court)	TBD	TBD
Deadline for the parties to jointly submit a form of order to enter judgment on the verdict and to submit a joint status report (should they wish to file one), indicating among other things how the case should proceed and listing any post-trial motions	7 days after each jury verdict	7 days after each jury verdict

