IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

ELM 3DS INNOVATIONS, LLC,

Plaintiff,

C.A. No. 14-cv-1430-LPS

v.

SAMSUNG ELECTRONICS CO., LTD., et al.,

Defendants.

JURY TRIAL DEMANDED

ELM 3DS INNOVATIONS, LLC,

Plaintiff,

C.A. No. 14-cv-1431-LPS

 $\mathbf{v}.$

MICRON TECHNOLOGY, INC., et al.,

Defendants.

JURY TRIAL DEMANDED

ELM 3DS INNOVATIONS, LLC,

Plaintiff,

C.A. No. 14-cv-1432-LPS

v.

SK HYNIX INC., et al.,

Defendants.

JURY TRIAL DEMANDED

MOTION TO AMEND COMPLAINTS

Pursuant to Federal Rule of Civil Procedure 15(a)(2), Plaintiff moves to file amended complaints in each of the above cases (the "Motion"). The grounds for the Motion are set forth in the accompanying opening letter brief.

Pursuant to D. Del. LR 7.1.1, a reasonable effort was made to reach agreement with opposing counsel regarding the subject matter of this Motion, including oral communication involving Delaware counsel, but no agreement was reached.



Dated: May 13, 2020

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

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