

**IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ELM 3DS INNOVATIONS LLC,
Plaintiff,

v.

MICRON TECHNOLOGY, INC.; MICRON
SEMICONDUCTOR PRODUCTS, INC.; and
MICRON CONSUMER PRODUCTS
GROUP, INC.,
Defendants.

Case No. 14-01431-LPS-CJB
Jury Trial Demanded

ELM 3DS INNOVATIONS LLC,
Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG SEMICONDUCTOR, INC.,
SAMSUNG ELECTRONICS AMERICA, INC.,
and SAMSUNG AUSTIN SEMICONDUCTOR,
LLC,
Defendants.

Case No. 14-01430-LPS-CJB
Jury Trial Demanded

ELM 3DS INNOVATIONS LLC,
Plaintiff,

v.

SK HYNIX INC., SK HYNIX AMERICA INC.,
HYNIX SEMICONDUCTOR
MANUFACTURING AMERICA INC., and SK
HYNIX MEMORY SOLUTIONS INC.,
Defendants.

Case No. 14-01432-LPS-CJB
Jury Trial Demanded

**NOTICE OF SUBPOENA DUCES TECUM AND NOTICE OF DEPOSITION OF RON
EPSTEIN**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure Rules 26 and 45, Defendants SK hynix Inc., SK hynix America Inc., Hynix Semiconductor Manufacturing America Inc., and SK hynix Memory Solutions Inc. (collectively, “SK hynix”); Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Consumer Products Group, Inc. (collectively, “Micron”); Samsung Electronics Co., Ltd., Samsung Semiconductor, Inc., Samsung Electronics America, Inc., and Samsung Austin Semiconductor, LLC (collectively, “Samsung”) (Micron, Samsung and SK hynix collectively referred to as “Defendants”) will take the deposition of Mr. Ron Epstein. The deposition will begin at 9:00 a.m. PST on July 7, 2020, at the offices of O’Melveny & Myers LLP, 2765 Sand Hill Rd., Menlo Park, CA 94025, or a location mutually agreed upon by the parties. The deposition will be taken upon oral examination pursuant to Federal Rule of Civil Procedure Rules 26 and 45 before a court reporter, notary public, or other person authorized by law to administer oaths, and will be recorded stenographically, by videotape, and by use of LiveNote.

Defendants reserve the right to seek additional testimony in the event additional facts or documents become available after the conclusion of the deposition on this Notice.

PLEASE FURTHER TAKE NOTICE Mr. Epstein is also required to produce all documents responsive to the “Documents to be Provided Pursuant to Fed. R. Civ. P. 45” set forth in Section III of the attached Exhibit A. Specifically, Mr. Epstein is hereby requested to produce and permit inspection and copying of all documents within his custody and control, as those terms are defined in Exhibit A, at O’Melveny & Myers LLP, 610 Newport Center Drive, 17th Floor, Newport Beach, CA 92660, beginning at 9:00 am PST, on June 29, 2020.

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June 15, 2020

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