

**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

**MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTE**

Plaintiff Elm 3DS Innovations, LLC (“Elm”) respectfully moves this Court to schedule a teleconference to address outstanding disputes regarding the following discovery matters:

- Defendants refusal to produce responsive, non-privileged documents and samples that are subject to non-disclosure agreements with third parties.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer by telephone on February 14, 2020:

Delaware Counsel for Elm: Michael Farnan  
Lead Counsel for Elm: Nosson Knobloch, Matt Ford, Kat Hacker  
Delaware Counsel for Micron: Tyler Cragg  
Lead Counsel for Micron: John Kappos, Hana Oh  
Delaware Counsel for Samsung: Adam Poff  
Lead Counsel for Samsung: Allan Soobert, Phillip Citroen  
Delaware Counsel for Sk hynix: Ben Schladweiler  
Lead Counsel for Sk hynix: Vishesh Narayen

The parties are available for a teleconference on the following dates:

- Tuesday, August 25, 2020
- Monday, August 31, 2020
- Tuesday, September 1, 2020

Dated: August 11, 2020

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

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