

**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
Brian E. Farnan (#4089)
Michael J. Farnan (#5165)
919 North Market Street
12th Floor
Wilmington, DE 19801
Tel: (302) 777-0300
Fax: (302) 777-0301
mfarnan@farnanlaw.com
bfarnan@farnanlaw.com

Adam K. Mortara (*pro hac vice*)
adam.mortara@bartlitbeck.com
Matthew R. Ford (*pro hac vice*)
matthew.ford@bartlitbeck.com
BARTLIT BECK LLP
54 W. Hubbard Street, Suite 300
Chicago, IL 60654
Tel: (312) 494-4400
Fax: (312) 494-4440

John M. Hughes (*pro hac vice*)
john.hughes@bartlitbeck.com
Nosson D. Knobloch (*pro hac vice*)
nosson.knobloch@bartlitbeck.com
Katherine L.I. Hacker (*pro hac vice*)
kat.hacker@bartlitbeck.com
Daniel C. Taylor (*pro hac vice*)
dan.taylor@bartlitbeck.com
BARTLIT BECK LLP
1801 Wewatta Street, Suite 1200
Denver, CO 80202
Tel: (303) 592-3100
Fax: (303) 592-3140

Counsel for Plaintiff
ELM 3DS INNOVATIONS, LLC