

**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

**STIPULATION TO AMEND SCHEDULING ORDER**

WHEREAS, the Court entered Amended Scheduling Orders on May 9, 2018 (D.I. 176), January 15, 2020 (Docket Text Order), March 26, 2020 (same); and July 16, 2020 (D.I. 316);

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

NOW THEREFORE, the parties hereby stipulate and agree, subject to the approval of the Court, to amend the scheduling order as follows:

<b>Event</b>	<b>Current Deadline</b>	<b>Extended Deadline</b>
Substantial completion of document production (for topics other than representative products); exchange of privilege logs	8/28/2020	10/16/2020
Deadline for Samsung to serve interrogatories and Rule 30(b)(6) deposition notices	9/25/2020	9/25/2020, or 28 days after any document production by Elm on new issues raised by that production  Later-served interrogatories by Samsung (3 total) relating to such document production will not count towards the interrogatory limit. <i>See</i> D.I. 125 ¶ 8(e).

Deadline for Elm to serve interrogatories and Rule 30(b)(6) deposition notices (for topics other than representative products)	9/25/2020	11/13/2020, or 28 days after any document production supplementation by Samsung on new issues raised by that supplementation
Samsung's substantial completion of document production on representative products	N/A	TBD
Elm's deadline to serve interrogatories and Rule 30(b)(6) deposition notices relating to representative products	N/A	28 days after Samsung's substantial completion of document production on representative products.  Later-served interrogatories by Elm (3 total) relating to such document production will not count towards the interrogatory limit. <i>See</i> D.I. 125 ¶ 8(e).
Elm's deadline to serve fact-deposition notices	N/A	28 days after Samsung's substantial completion of document production on representative products
Deadline to serve requests for admission	N/A	12/15/2020
Fact discovery closes	1/15/2020	No Change
Elm elects no more than 36 total claims and provides final infringement contentions	2/5/2020	No Change
Defendants' responses to contention interrogatories related to infringement	2/19/2020	No Change
Defendants elect no more than 36 prior art references and provide final invalidity contentions	2/26/2020	No Change
Elm's responses to contention interrogatories related to invalidity	3/16/2021	No Change
Opening expert reports	4/6/2021	No Change
Responsive expert reports	5/3/2021	No Change

Expert discovery closes	6/1/2021	No Change
Case dispositive and Daubert motions	6/21/2021	No Change
Responses to case dispositive and Daubert motions	7/12/2021	No Change
Replies to case dispositive and Daubert motions	7/19/2021	No Change
Hearing on pending dispositive and Daubert motions	TBD	No Change
Rule 16 Conference	TBD	No Change
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	No Change
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	No Change
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)	No Change
Pretrial conference	TBD	No Change
First jury trial (second and third jury trial to be determined by the Court)	TBD	No Change
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 each party intends to file	7 days after each jury verdict	No Change

Dated: October 6, 2020

FARNAN LLP

/s/ Brian E. 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*

Respectfully submitted,

YOUNG CONAWAY STARGATT &  
TAYLOR, LLP

/s/ Adam W. Poff

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*

IT IS SO ORDERED this \_\_\_ day of October, 2020.

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The Honorable Leonard P. Stark