

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ELM 3DS INNOVATIONS, LLC, a Delaware  
limited liability company,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., a  
Korean business entity,  
SAMSUNG SEMICONDUCTOR, INC., a  
California Corporation,  
SAMSUNG ELECTRONICS AMERICA,  
INC., a New York corporation, and  
SAMSUNG AUSTIN SEMICONDUCTOR,  
LLC, a Delaware limited liability company,

Defendants.

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

**MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTE**

Defendants (“Samsung”) in the above-referenced matter respectfully move the Court to schedule a discovery conference on Samsung’s requests for discovery on Plaintiff (“Elm”)’s litigation funding.

The following attorneys participated in a telephonic meet and confer on October 5, 2020:

- Delaware Counsel for Samsung: Adam Poff
- Lead Counsel for Samsung: Allan Soobert, Soyoun Jung and Phillip Citroen
- Delaware Counsel for Elm: Brian Farnan
- Lead Counsel for Elm: Kat Hacker, Nossong Knobloch

Counsel for Elm and Samsung, including the above-identified attorneys, have also exchanged correspondence on this dispute.

There are three specific discovery items for which Samsung seeks the Court’s assistance:

1. Elm's objections to Defendants' Request for Production Nos. 37-38, 73, 88-93.
2. Elm's objections and response to Defendants' Interrogatory No. 4.
3. Elm's objections to producing custodial discovery on the issue of litigation funding.

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

- October 29
- October 30
- November 4

OF COUNSEL:

Allan M. Soobert  
Naveen Modi  
Phillip W. Citroën  
PAUL HASTINGS LLP  
875 15th Street, N.W.  
Washington, D.C. 20005  
(202) 551-1700  
(202) 551-1705 (fax)  
allansoobert@paulhastings.com  
naveenmodi@paulhastings.com  
phillipcitroen@paulhastings.com

Dated: October 7, 2020

Respectfully submitted,

YOUNG CONAWAY STARGATT &  
TAYLOR, LLP

/s/ Adam W. Poff

Adam W. Poff (No. 3990)  
Pilar G. Kraman (No. 5199)  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
(302) 571-6600  
apoff@ycst.com  
pkraman@ycst.com

*Attorneys for Defendants*

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**CERTIFICATE OF SERVICE**

I, Adam W. Poff, hereby certify that on October 7, 2020, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Joseph J. Farnan, Jr. Esquire  
Brian E. Farnan, Esquire  
Michael J. Farnan, Esquire  
Farnan, LLP  
919 North Market Street, 12th Floor  
Wilmington, DE 19801  
*farnan@farnanlaw.com*  
*bfarnan@farnanlaw.com*  
*mfarnan@farnanlaw.com*

*Attorneys for Plaintiff*

I further certify that on October 7, 2020, I caused a true and correct copy of the foregoing document to be served by e-mail on the above-listed counsel of record, and on the following:

Adam K. Mortara, Esquire  
125 South Wacker Dr., Suite 300  
Chicago, IL 60606  
*adam@mortalalaw.com*

Matthew R. Ford, Esquire  
Bartlit Beck LLP  
54 West Hubbard Street, Suite 300  
Chicago, IL 60654  
*matthew.ford@bartlit-beck.com*

John M. Hughes, Esquire  
Katherine L.I. Hacker, Esquire  
Nosson D. Knobloch, Esquire  
Daniel C. Taylor, Esquire  
Bartlit Beck LLP  
1801 Wewatta, Suite 1200  
Denver, CO 80202  
john.hughes@bartlit-beck.com  
kat.hacker@bartlit-beck.com  
nosson.knobloch@bartlit-beck.com  
dan.taylor@bartlit-beck.com

*Attorneys for Plaintiff*

YOUNG CONAWAY STARGATT  
& TAYLOR, LLP

*/s/ Adam W. Poff*

Adam W. Poff (No. 3990)  
Pilar G. Kraman (No. 5199)  
Rodney Square  
1000 North King Street  
Wilmington, Delaware 19801  
(302) 571-6600  
*apoff@ycst.com*  
*pkraman@ycst.com*

*Attorneys for Defendants*