

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. 14-1430-LPS

**STIPULATION AND [PROPOSED] ORDER  
TO ENTER SUPPLEMENTAL PROTECTIVE ORDER**

WHEREAS, the Court has entered a Stipulated Protective Order (the “Protective Order”) governing the disclosure of confidential materials in the above-referenced matter;

WHEREAS, the Court has entered a Supplemental Protective Order governing the disclosure of the confidential materials of non-party Apple Inc. (D.I. 332) pursuant to the Court’s Oral Order (D.I. 327);

NOW THEREFORE, the parties hereby stipulate and agree, subject to the approval of the Court, to enter a Supplemental Protective Order for non-party Lam Research Corporation (“Lam Research”) as follows:

1. Disclosure of Lam Research Confidential Information. To the extent that a party seeks to disclose any Lam Research Confidential Information to any individual pursuant to Sections I.A.5.b (regarding experts or consultants) or I.A.5.f (regarding “any other person”) of the operative Protective Orders, the parties shall afford Lam Research the same notice, disclosure, and consent rights as provided to a producing party under the Protective Orders.
2. Exhibit List. The parties shall notify Lam Research should any Lam Research Confidential Information appear on any party’s trial exhibit list; and
3. Use of Lam Research Confidential Information at Hearing or at Trial. The parties shall use reasonable efforts to seal the courtroom and redact any related transcript should the Lam Research Confidential Information be discussed at hearing or at trial; or provide Lam Research with reasonable notice before such information is used so that Lam Research may intervene.

DATED: October 23, 2020

/s/ Brian E. Farnan

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America, Inc., and Samsung Austin  
Semiconductor, LLC*

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

\_\_\_\_\_  
Honorable Leonard P. Stark  
Chief, United States District Judge

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