

# Exhibit 1

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ELM 3DS INNOVATIONS, LLC,

Plaintiff,

v.

MICRON TECHNOLOGY, INC., MICRON  
SEMICONDUCTOR PRODUCTS, INC., and  
MICRON CONSUMER PRODUCTS  
GROUP, INC.,

Defendants.

C.A. No. 14-1431-LPS-CJB

ELM 3DS INNOVATIONS, LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG SEMICONDUCTOR, INC.,  
SAMSUNG ELECTRONICS AMERICA,  
INC., and SAMSUNG AUSTIN  
SEMICONDUCTOR,  
LLC,

Defendants.

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

ELM 3DS INNOVATIONS, LLC,

Plaintiff,

v.

SK HYNIX INC., SK HYNIX AMERICA  
INC., HYNIX SEMICONDUCTOR  
MANUFACTURING AMERICA INC., and  
SK HYNIX MEMORY SOLUTIONS  
INC.,

Defendants.

C.A. No. 14-1432-LPS-CJB

**DEFENDANTS' FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS  
AND THINGS TO PLAINTIFF ELM 3DS INNOVATIONS, LLC (Nos. 1 -76)**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure Defendants Samsung Electronics Co., Ltd., Samsung Semiconductor Inc., Samsung Austin Semiconductor LLC, and Samsung Electronics America, Inc. (Case No. 14-cv-1430-LPS), SK hynix Inc., SK hynix America, Inc., Hynix Semiconductor Manufacturing America, Inc., and SK hynix Memory Solutions Inc. (Case No. 14-cv-01432-LPS-CJB), and Micron Technology, Inc., Micron Semiconductor Products, Inc. and Micron Consumer Products Group, Inc. (Case No. 14-cv-01431-LPS-CJB) (“Defendants”) hereby request that Plaintiff Elm 3DS Innovations, LLC (“Elm”) produce the Documents and Things described below for inspection and copying at the offices of Paul Hastings LLP, 875 15th Street, N.W. Washington, D.C. 20005; O’Melveny & Myers LLP, 610 Newport Center Drive, Newport Beach, CA 92660; and K&L Gates, Four Embarcadero Center Suite 1200, San Francisco, CA 94111.

**DEFINITIONS**

1. If Elm requires clarification of a Definition of any term to comply with any request for production, contact undersigned counsel and request such clarification of Definition.
2. “Elm,” “Plaintiff,” “You,” or “Your” means Elm 3DS Innovations, LLC (and/or Glenn Leedy) and all of its subsidiaries, parent companies, holding companies, divisions, subdivisions, components, units, partnerships, limited partnerships, joint ventures, associations, and affiliates; all predecessors, successors, and assigns of each of the foregoing; all past and present officers, employees, directors, agents, consultants, representatives, and attorneys of each of the foregoing; and all other Persons acting or purporting to act for, on behalf of, or in the interest of Elm.

3. “Defendants” means Samsung Electronics Co., Ltd., Samsung Semiconductor Inc., Samsung Austin Semiconductor LLC, and Samsung Electronics America, Inc. (Case No. 14-cv-1430-LPS), SK hynix Inc., SK hynix America, Inc., Hynix Semiconductor Manufacturing America, Inc., and SK hynix Memory Solutions Inc. (Case No. 14-cv-01432-LPS-CJB), and Micron Technology, Inc., Micron Semiconductor Products, Inc. and Micron Consumer Products Group, Inc. (Case No. 14-cv-01431-LPS-CJB); and all of their subsidiaries, parent companies, holding companies, divisions, subdivisions, components, units, partnerships, limited partnerships, joint ventures, associations, and affiliates; all predecessors, successors, and assigns of each of the foregoing; all past and present officers, employees, directors, agents, consultants, representatives, and attorneys of each of the foregoing; and all other Persons acting or purporting to act for, on behalf of, or in the interest of Defendants.

4. “Patents-in-Suit” and “Asserted Patents” currently refer to U.S. Patent Nos. 7,193,239; 7,474,004; 7,504,732; 8,035,233; 8,410,617; 8,629,542; 8,653,672; 8,791,581, 8,796,862; 8,841,778; 8,907,499; 8,928,119; and 8,933,570. If Elm amends its Complaint to include infringement counts as to additional asserted patent(s), the terms “Patent-in-Suit” and “Asserted Patents” shall also encompass the later-asserted patent(s) and Elm’s duty to serve supplemental Documents in accordance with Rule 26(e) of the Federal Rules of Civil Procedure.

5. The terms “Lawsuits,” “Actions,” “Cases,” or “Proceedings” refer to the above captioned litigations, Elm 3DS Innovations, LLC vs. Samsung Electronics Co., Ltd., et al., Case No. 14-cv-1430-LPS, Elm 3DS Innovations, LLC vs. Micron Technology, Inc., et al., Case No. 14-cv-1431-LPS, or Elm 3DS Innovations, LLC vs. SK hynix, Inc., et al., Case No. 14-cv-1432-LPS.

6. “People” and “Person” shall include any natural individual, business, corporation, independent establishment, firm, partnership, joint venture, other business organization; and any charitable, religious, educational, governmental, legal or other institution, foundation, body, organization, or entity. The terms include any and all of that Person’s predecessors, successors, assigns, Personal representatives, agents, attorneys, and heirs whether by operation of law or otherwise. Unless otherwise stated, the terms also include any employee, agent, or representative of any of the foregoing and any other individual or entity mentioned in these instructions and definitions.

7. “Prior Art” means any and all knowledge or learning, or any evidence thereof, that existed prior to the filing date of a Patent-in-Suit, and that relates to (a) the Patents-in-Suit or any application or patent related to the Patents-in-Suit, (b) the subject matter disclosed in the Patents-in-Suit or any application or patent related to the Patents-in-Suit, (c) any product, system, or method referenced in the Patents-in-Suit or any application or patent related to the Patents-in-Suit, or (d) any product, system, or method that allegedly infringed or infringes any claim of the Patents-in-Suit. “Prior Art” may take any form, including, without limitation, Documents, articles, publications, presentation materials, pamphlets, products, product-related Documents, manuals, marketing materials, educational materials, public uses, physical specimens, prototypes, contracts, sales, offers to sell, and United States and foreign patents and patent applications.

8. “Related Patent” or “patent related to” means any patent that issued from any application, in any country, that: (a) is a parent, child, or ancestral application related in any way to a given patent; (b) is a continuation application, continuation-in-part application, divisional application, file-wrapper continuation, reexamination, reissue application, provisional given

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