

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

NOTICE OF DEPOSITION

Defendants Samsung Electronics Co., Ltd., Samsung Semiconductor, Inc., Samsung Electronics America, Inc., and Samsung Austin Semiconductor, LLC (collectively, “Samsung”), by and through its undersigned counsel, hereby provide notice that pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Samsung will take the deposition upon oral examination of Ron Epstein before a notary public or other officer authorized to administer oaths. The depositions will commence via videoconference at 9:00 AM on November 23, 2020, or at such other date and time to be agreed upon by the parties.

This deposition will be recorded by any means permitted by the Federal Rules of Civil Procedure, including, without limitation, stenographic means, audiotape and videotape.



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

Dated: November 10, 2020

27320286.1

CERTIFICATE OF SERVICE

I, Adam W. Poff, hereby certify that on November 10, 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 November 10, 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