

**IN THE UNITED STATE 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

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

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

NOTICE OF SUBPOENA AND NOTICE OF DEPOSITION OF PHILIP MAUGER

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure Rules 26 and 45, Defendants SK hynix Inc., SK hynix America Inc., Hynix Semiconductor Manufacturing America Inc., and SK hynix Memory Solutions Inc. (collectively, “SK hynix”); Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Consumer Products Group, Inc. (collectively, “Micron”); Samsung Electronics Co., Ltd., Samsung Semiconductor, Inc., Samsung Electronics America, Inc., and Samsung Austin Semiconductor, LLC (collectively, “Samsung”) (Micron, Samsung and SK hynix collectively referred to as “Defendants”) will take the deposition of Mr. Philip Mauger, pursuant to the attached subpoena (Exhibit 1). The deposition will begin at a time and location mutually agreed upon by the parties by remote means. The deposition will be taken upon oral examination pursuant to Federal Rule of Civil Procedure Rules 26 and 45 before a court reporter, notary public, or other person authorized by law to administer oaths, and will be recorded stenographically, by videotape, and by use of LiveNote.

*Counsel for SK hynix:
Of Counsel:*

L. Howard Chen
Harold H. Davis
Nicholas A. Brown
GREENBERG TRAURIG, LLP
Four Embarcadero Center, Suite 3000
San Francisco, CA 94111
(415) 655-1300
chenh@gtlaw.com
davish@gtlaw.com

Vishesh Narayan
GREENBERG TRAURIG, LLP
101 East Kennedy Boulevard, Suite 1900
Tampa, FL 33602
(813) 318.5700
narayenv@gtlaw.com

Counsel for Micron:

Of Counsel:

John Kappos
Hana Oh Chen
O'MELVENY & MYERS LLP
610 Newport Center Drive
Newport Beach, CA 92660-3823
Telephone: (949) 823-6900
jkappos@omm.com
hchen@omm.com

Brian Cook
Xin-Yi Zhou
O'MELVENY & MYERS LLP
400 South Hope Street
Los Angeles, CA 90071-2899
Telephone: (213) 430-6000
bcook@omm.com
vzhou@omm.com

GREENBERG TRAURIG, LLP

/s/ Benjamin J. Schladweiler

Benjamin J. Schladweiler (#4601)
The Nemours Building
1007 North Orange Street, Suite 1200
Wilmington, DE 19801
(302) 661-7352
schladweilerb@gtlaw.com

*Attorneys for Defendants SK hynix Inc., SK
hynix America Inc., Hynix Semiconductor
Manufacturing America Inc., and SK Hynix
Memory Solutions Inc,*

RICHARDS, LAYTON & FINGER

/s/ Frederick L. Cottrell, III

Frederick L. Cottrell, III (#2555)
Travis S. Hunter (#5350)
Tyler E. Cragg (#6398)
RICHARDS LAYTON & FINGER, P.A.
920 North King Street
One Rodney Square
Wilmington, DE 19801
(302) 651-7700
cottrell@rlf.com
hunter@rlf.com
cragg@rlf.com

*Attorneys for Defendant Micron Technology,
Inc., Micron Semiconductor Products, Inc.,
and Micron Consumer Products Group, Inc.*

Counsel for Samsung:

Of Counsel:

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

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*

Dated: November 10, 2020

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

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.