

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

MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTES

The parties in the above-referenced matter respectfully move the Court to schedule a discovery conference on Elm's request for discovery regarding Samsung's accused products and on Samsung's requests for discovery on Elm's documents on valuation.

The following attorneys participated in a telephonic meet and confer on Elm's discovery requests on November 2, 2020, and November 6, 2020:

- Delaware Counsel for Samsung: Adam Poff
- Lead Counsel for Samsung: Allan Soobert, Liza Brann, Phillip Citroen, and Soyoung Jung
- Delaware Counsel for Elm: Brian Farnan
- Lead Counsel for Elm: Nossong Knobloch

The following attorneys participated in a telephonic meet and confer on Samsung's discovery requests on October 21, 2020:

- Delaware Counsel for Samsung: Adam Poff
- Lead Counsel for Samsung: Allan Soobert, Liza Brann and Soyoung Jung
- Delaware Counsel for Elm: Brian Farnan
- Lead Counsel for Elm: Matt Ford

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

Elm seeks the Court's assistance regarding Samsung's objection to discovery regarding stacked semiconductor products with a die thickness greater than 50 microns but a substrate thickness of 50 microns or below.

There are two discovery items for which Samsung seeks the Court's assistance:

1. Elm's objections and response to Defendants' Requests for Production Nos. 59, 62, 157, 167.
2. Elm's objections and response to Defendants' Interrogatory No. 5.

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

- December 2
- December 3
- December 11 (after Noon Eastern Time)

Respectfully submitted,

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

/s/ Adam W. Poff

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CERTIFICATE OF SERVICE

I, Adam W. Poff, hereby certify that on November 12, 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:

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Attorneys for Plaintiff

I further certify that on November 12, 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:

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