

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ELM 3DS INNOVATIONS, LLC, a Delaware limited liability company,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 14-1430-LPS
	)	
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.	)	

**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: Nossou 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 Soyoun 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*

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*

27332037.1

**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:

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 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:

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*