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November 13, 2020

VIA E-FILING The Honorable Jennifer L. Hall J. Caleb Boggs Federal Building 844 N. King Street Unit 17, Room 3124 Wilmington, DE 19801-3555

FILED UNDER SEAL

RE: *Elm 3DS Innovations, LLC v. Samsung Electronics Co., Ltd. et al.*, (C.A. No. 14-cv-1430-LPS)

Dear Judge Hall:

Pursuant to the Court's order during the teleconference on October 30, 2020, Plaintiff Elm 3DS Innovations, LLC

Based on the Court's guidance during the hearing, Elm produced eight of those documents to Samsung on November 10, 2020. Those eight documents were unsolicited offers sent to the inventor in this case. Some of those documents included offers for litigation funding and offers to monetize the patents generally. Elm does not believe those documents are relevant,

Elm has produced that set.





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Respesctfully submitted,

/s/ Michael J. Farnan

Michael J. Farnan

cc: Counsel of Record without enclosures (Via E-Mail)