



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 [REDACTED]

[REDACTED] 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, [REDACTED] [REDACTED] Elm has produced that set.

[REDACTED]

[REDACTED]

010N MARKET STREET, 12TH FLOOR, WILMINGTON, DE 19801

[REDACTED]

[REDACTED]

Respectfully submitted,

/s/ Michael J. Farnan

Michael J. Farnan

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