

Exhibit A

From: Nosson Knobloch
Sent: Thursday, June 20, 2019 11:26 AM
To: Jung, Soyoung; ServicePH Samsung-ELM 3DS
Cc: Mailing List - Leedy
Subject: RE: Elm Discovery Correspondence

Soyoung,

I would like to schedule a meet and confer to discuss next steps regarding the identification of representative products.

In light of the Federal Circuit's recent decision, Elm currently intends to accuse of infringement all Samsung semiconductor products that contain more than one circuit layer, where at least one circuit layer is stacked above or below another circuit layer, and where at least one of the layers has a thickness of 50 microns or less. Elm reserves the right to update its position for any reason, including in the event that this Court (or any court of appeal) adopts a different construction of the "substantially flexible" claim terms.

In order to move forward with the selection of representative products, I would like to discuss the following issues:

1. Whether Samsung has already identified all products sold between 2008 and 2018 that meet the above criteria.
2. How the parties will handle the Samsung semiconductor products for which Samsung has not, to date, supplied complete die thickness data.
3. How the parties will select representative products from the complete set of accused products.

Please let me know if there is a time early next week when you are available to discuss these issues.

In addition, it's been almost a month since I sent the below email, but have not received any meaningful response. Please let us know your thoughts on the below issues this week.

Thanks,

-Nosson

BartlitBeck LLP

Nosson D. Knobloch | p: 303.592.3122 | c: 773.301.2851 | Nosson.Knobloch@BartlitBeck.com | 1801 Wewatta Street, 12th Floor, Denver, CO 80202

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From: Nosson Knobloch <nosson.knobloch@bartlitbeck.com>

Sent: Wednesday, May 22, 2019 9:24 AM

To: Jung, Soyoung <soyoungjung@paulhastings.com>; ServicePH Samsung-ELM 3DS <ServicePHSamsung-ELM3DS@paulhastings.com>; apoff@ycst.com; Kraman, Pilar <PKraman@ycst.com>

Cc: Mailing List - Leedy <leedy@bartlit-beck.com>

Subject: RE: Elm Discovery Correspondence

Soyoung,

I am surprised to hear that you believe you've produced your supplier documents. From what I can see, your April 22 production contained no email. For many months, we've been asking for your *communications* with your dielectric suppliers about dielectric stress. Will you be producing those?

Relatedly, your April 22 production is missing the standard metadata. Can you please provide an overlay with that information?

Thanks,

-Nosson

BartlitBeck LLP

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From: Jung, Soyoung <soyoungjung@paulhastings.com>

Sent: Tuesday, May 21, 2019 6:17 PM

To: Nosson Knobloch <nosson.knobloch@bartlitbeck.com>; ServicePH Samsung-ELM 3DS <ServicePHSamsung-ELM3DS@paulhastings.com>; apoff@ycst.com; Kraman, Pilar <PKraman@ycst.com>

Cc: Mailing List - Leedy <leedy@bartlit-beck.com>

Subject: RE: Elm Discovery Correspondence

Nosson,

We produced Samsung's supplier documents on April 22. Samsung may discover additional documents as part of its ongoing discovery efforts based on the list of search terms that the parties agree on.

Regards,
Soyoung

From: Nosson Knobloch <nosson.knobloch@bartlitbeck.com>
Sent: Tuesday, May 21, 2019 6:44 AM
To: Jung, Soyoung <soyoungjung@paulhastings.com>; ServicePH Samsung-ELM 3DS <ServicePHSamsung-ELM3DS@paulhastings.com>; apoff@ycst.com; Kraman, Pilar <PKraman@ycst.com>
Cc: Mailing List - Leedy <leedy@bartlit-beck.com>
Subject: [EXT] RE: Elm Discovery Correspondence

Thanks, Soyoung. Can you please also let me know when we can expect your production of communications with third party dielectric suppliers?

BartlitBeck LLP

Nosson D. Knobloch | p: 303.592.3122 | c: 773.301.2851 | Nosson.Knobloch@BartlitBeck.com | 1801 Wewatta Street, 12th Floor, Denver, CO 80202

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From: Jung, Soyoung <soyoungjung@paulhastings.com>
Sent: Monday, May 20, 2019 10:35 PM
To: Nosson Knobloch <nosson.knobloch@bartlitbeck.com>; ServicePH Samsung-ELM 3DS <ServicePHSamsung-ELM3DS@paulhastings.com>; apoff@ycst.com; Kraman, Pilar <PKraman@ycst.com>
Cc: Mailing List - Leedy <leedy@bartlit-beck.com>
Subject: RE: Elm Discovery Correspondence

Nosson,

We identify the following 5 Samsung employees for Elm's custodial discovery requests: Gunho Chang, Jiwoon Im, Ilho Kim, Tae-Young Lee and Jongyoung Park.

We will be sending you our proposed search terms for Elm shortly.

Regards,
Soyoung

From: Jung, Soyoung
Sent: Friday, May 10, 2019 6:39 PM
To: 'Nosson Knobloch' <nosson.knobloch@bartlitbeck.com>; ServicePH Samsung-ELM 3DS <ServicePHSamsung-ELM3DS@paulhastings.com>; apoff@ycst.com; Kraman, Pilar <PKraman@ycst.com>
Cc: Mailing List - Leedy <leedy@bartlit-beck.com>
Subject: RE: Elm Discovery Correspondence

Nosson,

I wanted to give you an update that we have been diligently working with Samsung in Korea this week to identify appropriate custodians, but we will need another week to conclude our investigation. Therefore, we would like to move the date by which Samsung identifies custodians from May 13 to May 20. All the other dates of custodial discovery that we agreed on will stay the same.

We will respond to Matt's email from today separately.

Soyoung

From: Nosson Knobloch <nosson.knobloch@bartlitbeck.com>
Sent: Friday, May 3, 2019 1:46 PM
To: #ELM3DS-MICRON-OMM <ELM3DS-MICRON-OMM@omm.com>; Skhynix-Elm@klgates.com; ServicePH Samsung-ELM 3DS <ServicePHSamsung-ELM3DS@paulhastings.com>
Cc: Mailing List - Leedy <leedy@bartlit-beck.com>
Subject: [EXT] Elm Discovery Correspondence

Dear Counsel,

Please see the attached correspondence.

Thanks,

-Nosson

BartlitBeck LLP

Nosson D. Knobloch | p: 303.592.3122 | c: 773.301.2851 | Nosson.Knobloch@BartlitBeck.com | 1801 Wewatta Street, 12th Floor, Denver, CO 80202

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