

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ELM 3DS INNOVATIONS, LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., et al.,

Defendants.

C.A. No. 14-cv-1430-LPS

JURY TRIAL DEMANDED

**STIPULATION TO AMEND SCHEDULING ORDER**

WHEREAS, the Court entered Amended Scheduling Orders on May 9, 2018 (*e.g.*, C.A. No. 14-cv-01430-LPS, D.I. 176), January 15, 2020 (*id.*, Docket Text Order), March 26, 2020 (same), July 16, 2020 (*id.*, D.I. 316), October 6, 2020 (*id.*, D.I. 338), and January 7, 2021 (*id.*, Docket Text Order);

WHEREAS, the parties have not yet completed fact discovery in this case;

NOW THEREFORE, the parties hereby stipulate and agree, subject to the approval of the Court, to amend the scheduling order as follows:

Event	Current Deadline	Extended Deadline
Samsung to substantially complete discovery on representative products, including document production, production of samples, and interrogatory supplementation.	n/a	9/15/2021
Elm's deadline to serve interrogatories and Rule 30(b)(6) deposition notices relating to Samsung's representative products (the parties' respective deadlines to serve interrogatories and Rule 30(b)(6) deposition notices for all other issues have passed)	28 days after Samsung's substantial completion of document production on representative products. Later-served interrogatories by Elm on Samsung (3 total) relating to such document production will not count towards the interrogatory limit. See D.I. 125 ¶ 8(e) in C.A. No. 14-cv-01430-LPS	10/7/2021
Elm's deadline to serve fact-deposition notices on Samsung	28 days after Samsung's substantial completion of document production on representative products	10/7/2021
Fact discovery closes	7/15/2021	11/5/2021
Elm elects no more than 36 total claims and provide final infringement contentions	8/5/2021	11/23/2021
Defendants' responses to contention interrogatories related to infringement	8/19/2021	12/10/2021
Defendants elect no more than 36 prior art references and provide final invalidity contentions	8/27/2021	12/22/2021
Elm's responses to contention interrogatories related to invalidity	9/17/2021	1/7/2022
Opening expert reports	10/7/2021	1/21/2022
Responsive expert reports	11/2/2021	2/18/2022
Expert discovery closes	12/3/2021	3/11/2022

<b>Event</b>	<b>Current Deadline</b>	<b>Extended Deadline</b>
Case dispositive and Daubert motions	12/22/2021	3/25/2022
Responses to case dispositive and Daubert motions	1/26/2021	4/29/2022
Replies to case dispositive and Daubert motions	2/2/2022	5/11/2022
Hearing on pending dispositive and Daubert motions	TBD	TBD
Rule 16 Conference	TBD	TBD
Deadline for Elm to provide a draft pretrial order to all other parties	30 days before the pretrial order is to be filed with the Court	No Change
Deadline for all other parties to provide Elm and each other party with their responses to Elm's draft order	14 days before the pretrial order is to be filed with the Court	No Change
Deadline for the parties to file a joint proposed statement setting forth their positions regarding trial sequencing and scheduling	Third business day before the date of the Pretrial Conference (6 p.m. ET)	No Change
Pretrial conference	TBD	TBD
First jury trial (second to be determined by the Court)	TBD	TBD
Deadline for the parties to jointly submit a form of order to enter judgment on the verdict and to submit a joint status report (should they wish to file one), indicating among other things how the case	7 days after each jury verdict	No Change

Dated: July 16, 2021

FARNAN LLP

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Semiconductor, LLC*

IT IS SO ORDERED

Date: \_\_\_\_\_

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The Honorable Leonard P. Stark