



WILMINGTON  
RODNEY SQUARE

NEW YORK  
ROCKEFELLER CENTER

**Adam W. Poff**  
P 302.571.6642  
F 302.576.3326  
apoff@ycst.com

January 26, 2022

**BY ELECTRONIC FILING**

The Honorable Jennifer L. Hall  
United States District Court, District of Delaware  
844 N. King Street  
Wilmington, DE 19801-3568

Re: *ELM 3DS Innovations, LLC v. Samsung Electronics Co., Ltd., et al.*,  
C.A. No. 14-1430-LPS-JLH

Dear Judge Hall:

Samsung respectfully requests clarification regarding the Court's January 13, 2022 Oral Order in *Elm 3DS Innovations, LLC v. Samsung Electronics Co., Ltd., et al.* D.I. 459. In that order, the Court denied Samsung's request to compel production of two amendments to the Engagement Agreement and granted-in-part Samsung's request to compel production of the Term Sheet by ordering production of a redacted version. *Id.*

Samsung seeks clarification on this order because Samsung's discovery dispute letter brief sought both the Term Sheet, **as well as any other related documents affecting Ron Epstein's compensation**. See D.I. 449 at 2–3. The Court addressed and ordered production of a redacted version of the Term Sheet, but the Court's order did not address other related documents. Samsung, therefore, respectfully requests clarification on the scope of the Court's order regarding production by Elm of other related documents affecting Ron Epstein's compensation.

Respectfully submitted,

/s/ Adam W. Poff

Adam W. Poff (No. 5199)

cc: Counsel of Record (via E-Filing and E-Mail)  
Clerk of the Court (via Hand Delivery)