



UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF DELAWARE

ELM 3DS INNOVATIONS, LLC.,)
)
 Plaintiff,)
) CIVIL ACTION NO. 14-cv-1430-LPS-JLH
 v.)
)
 SAMSUNG ELECTRONICS CO., LTD, ET AL.)
)
 Defendant.)
 _____/)

MOTION FOR PROTECTIVE ORDER
RELATIVE TO THE DEPOSITION OF JULIETTE E. LIPPMAN, ESQ.
SCHEDULED FOR FEBRUARY 15, 2022

COMES NOW, JULIETTE E. LIPPMAN, ESQ., by and through her undersigned counsel and files the above-referenced Motion for Protective Order Relative to the Deposition of Juliette E. Lippman, Esq. Scheduled for February 15, 2022 and as grounds therefore states:

1. Counsel for the Defendant, SAMSUNG ELECTRONICS CO, LTD, ET AL. (hereinafter “Defendant”) has issued a Subpoena to Testify at a Deposition in a Civil Action (hereinafter “Subpoena”) directed to Juliette E. Lippman, Esq. scheduled for February 15, 2022 at 9:00 a.m. A copy of the referenced Subpoena is attached hereto as Composite Exhibit “A”.

The Subpoena was served to Ms. Lippman on January 12, 2022.

2. The February 15, 2022 Deposition was not coordinated with Ms. Lippman. It was simply unilaterally scheduled. Ms. Lippman is not available on February 15, 2022. Further, there is no place for the requested deposition that has been identified.

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Elm 3DS Innovation v Samsung Electronics
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3. Ms. Lippman was the attorney for Glenn J. Leedy for a dissolution of marriage matter which was filed in 2011 in the 17th Judicial Circuit of Broward County, *Julia A. Leedy v Glenn J. Leedy*, Broward County Case Number FMCE 11-007902. The Final Judgment in this divorce proceeding was entered on January 7, 2013, approximately 9 years ago. Ms. Lippman is requesting an Order of Protection as the Subpoena because her testimony regarding this matter is protected by the attorney client privilege. Her former client, Glenn Leedy is deceased and as such, Ms. Lippman is not aware of his personal representative waiving the attorney-client privilege or the attorney work product.

4. Ms. Lippman requests a Court Order regarding the waiver of the attorney-client privilege should the deposition lawfully proceed.

5. Also, the subpoena does not state a specific location/address for Ms. Lippman's deposition. In addition, since the jurisdiction for deposition appears to be Delaware, Ms. Lippman should not be required to travel for this deposition since she is located in Fort Lauderdale, Florida.

6. Accordingly, for all the reasons stated above, this Honorable Court should enter an Order of Protection relative to the taking of the deposition of Juliette E. Lippman, Esq. on February 15, 2022.

7. That the Defendant has improperly scheduled the deposition of Ms. Lippman, she requests attorney's fees and costs relative to the prosecution of this Motion for which the Defendant should be responsible.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via U.S. Mail to the United States District Court, District of Delaware, Office of the Clerk, 844 North King Street, Unit 18, Wilmington, DE 19801 and via electronic mail and U.S. Mail to all counsel and parties of record in this matter listed in the CM/ECF Portal on this 21st day of January, 2022.

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BY:


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