

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF DELAWARE



ELM 3DS INNOVATIONS, LLC., )

Plaintiff, )

v. )

SAMSUNG ELECTRONICS CO., LTD, ET AL.)

Defendant. )

) CIVIL ACTION NO. 14-cv-1430-LPS-JLH

**AMENDED MOTION FOR PROTECTIVE ORDER**  
**RELATIVE TO SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR**  
**OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**  
**DIRECTED TO JULIETTE E. LIPPMAN**

COMES NOW, JULIETTE E. LIPPMAN, ESQ., by and through her undersigned counsel and files the above-referenced Amended Motion for Protective Order Relative to Subpoena to Produce Documents, Information, Or Objects or to Permit Inspection of Premises in a Civil Action directed to Juliette E. Lippman, and as grounds therefore states:

1. Counsel for the Defendant, SAMSUNG ELECTRONICS CO, LTD, ET AL. (hereinafter "Defendant") has issued a Subpoena to Produce Documents, Information, Or Objects or to Permit Inspection of Premises in a Civil Action (hereinafter "Subpoena") directed to Juliette E. Lippman scheduled for February 1, 2022 at 9:00 a.m. A copy of the referenced Subpoena is attached hereto as Composite Exhibit "A".

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

3. The February 1, 2022 date for the production of documents was not coordinated with Ms. Lippman. It was simply unilaterally scheduled. Further, there is no place for the requested

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*Elm 3DS Innovation v Samsung Electronics*  
*Case No.: 14-cv-1430-LPS-JLH*  
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production to be delivered that has been identified.

4. The Subpoena requests that Ms. Lippman produce documents pertaining to a divorce matter which was filed in 2011 in the 17<sup>th</sup> Judicial Circuit of Broward County, *Julia A. Leedy v Glenn J. Leedy*, Broward County Case Number FMCE 11-007902.<sup>1</sup>

5. The documents sought are protected because the requests seek documents that are protected from disclosure by the attorney-client privilege or the attorney work product doctrine including information that reflects the legal advice, mental impressions, and legal strategies prepared for anticipated or pending litigation.

6. Ms. Lippman is requesting a Court Order regarding the production of these requested documents as her 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.

7. Accordingly, for all the reasons stated above, this Honorable Court requests the entry of an Order for Protection relative to the production of documents directed to Juliette E. Lippman, Esq. scheduled for February 1, 2022 so that no Subpoena To Produce Documents, Information, Or Inspection shall issue so that it is not obligated to respond to any such request.

8. Ms. Lippman has incurred attorney's fees and costs relative to the prosecution of this Motion for which the Defendant should be responsible.

WHEREFORE, JULIETTE E. LIPPMAN, ESQ., respectfully requests this Honorable Court

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<sup>1</sup> The undersigned filed a Motion for Protective Order dated January 27, 2022 and represented that the documents for the case which were requested either do not exist and/or are no longer in the possession of Ms. Lippman. Since that time the undersigned located the documents which were archived on a DVD.

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enter an Order of Protection relative to the February 1, 2022 date for production of documents scheduled by the Defendant, awarding Ms. Lippman attorney's fees and costs relative to the prosecution of this Motion and granting such other and further relief as this Court deems just and proper under the circumstances.

  
JULIETTE E. LIPPMAN, ESQ.

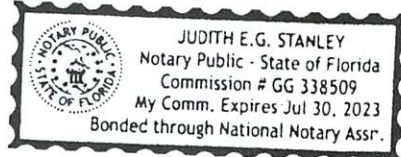
STATE OF FLORIDA     )  
  )ss:  
COUNTY OF Broward )

The foregoing instrument was acknowledged before me by means of ☒ physical presence or ( ) online notarization, this 3rd day of February, 2022, by JULIETTE E. LIPPMAN, ESQ. who is personally known to me or who has produced \_\_\_\_\_ as identification.

WITNESS my hand and official seal this 3rd day of February, 2022.

  
\_\_\_\_\_  
Notary Public - State of Florida

My Commission Expires:



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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 3<sup>rd</sup> day of February, 2022.

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BY:

  
JULIETTE E. LIPPMAN, ESQ.  
Florida Bar No.: 983292

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