

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

ELM 3DS INNOVATIONS, LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 14-cv-01430-VAC
)	
SAMSUNG ELECTRONICS CO., LTD.,)	
SAMSUNG SEMICONDUCTOR, INC.,)	
SAMSUNG ELECTRONICS AMERICA, INC.,)	
and SAMSUNG AUSTIN SEMICONDUCTOR,)	
LLC,)	
)	
Defendants.)	
)	

**DEFENDANTS’ UNOPPOSED MOTION TO COMPEL
JULIETTE LIPPMAN’S PRODUCTION OF DOCUMENTS**

Defendants Samsung Electronics Co., Ltd., Samsung Semiconductor, Inc., Samsung Electronics America, Inc., and Samsung Austin Semiconductor, LLC (collectively, “Samsung”) hereby submit this unopposed motion to compel Juliette Lippman’s production of documents from the case *Julia A. Leedy v. Glenn J. Leedy*, Broward County Case Number FMCE 11-007902, pursuant to Samsung’s Subpoena to Produce Documents served on Ms. Lippman in the above-captioned action. This unopposed motion—which Ms. Lippman has reviewed—requests that Ms. Lippman produce non-privileged documents responsive to that subpoena, including the deposition transcript of Mr. Glenn Leedy.

Samsung recognizes that these documents, including the deposition transcript of Mr. Glenn Leedy, also contain irrelevant information regarding Julia Leedy’s and Glenn Leedy’s children (“Leedy children”). Pursuant to the Court’s instruction during the March 15, 2022 discovery teleconference, Samsung agrees that it will not use, disclose, or otherwise rely on any irrelevant information regarding the Leedy children and also requests an order from the Court that no party

can use, disclose, or otherwise rely on any irrelevant information regarding the Leedy children. Furthermore, any documents produced will be designated CONFIDENTIAL or HIGHLY CONFIDENTIAL according to the protective order entered in this case.¹ Samsung, therefore, respectfully requests that the Court enter the attached proposed order.

DATED: March 29, 2022

Respectfully submitted,

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¹ Samsung reserves the right to seek to de-designate relevant portions of any document produced (e.g., those portions related to the patents or Elm) if appropriate and pursuant to the procedures provided for in the protective order.

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CERTIFICATE OF SERVICE

I, Adam W. Poff, hereby certify that on March 29, 2022, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

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