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.))

PROPOSED ORDER

Before the Court is Samsung's Unopposed Motion to Compel Juliette Lippman's production of documents. Having considered that unopposed motion, Samsung's and Ms. Lippman's briefing regarding Ms. Lippman's motion for a protective order regarding Samsung's document subpoena to Ms. Lippman (D.I. 464, D.I. 469, D.I. 475), as well as oral argument regarding Ms. Lippman's motion for a protective order regarding Samsung's document subpoena, the Court hereby GRANTS Samsung's unopposed motion to compel and issues the

- Ms. Lippman shall produce non-privileged documents responsive to Samsung's document subpoena, including the full deposition transcript of Mr. Glenn Leedy;
- Because any produced documents may contain irrelevant, sensitive information regarding
 Julia Leedy's and Glenn Leedy's children ("Leedy children"), the Court orders that no
 party shall use, disclose, or otherwise rely on any irrelevant information regarding the
 Leedy children; and



following order:

• Any documents produced will be designated CONFIDENTIAL or HIGHLY CONFIDENTIAL under the protective order in this action, but a party in this action may seek to de-designate relevant portions of those documents if appropriate and pursuant to the procedures provided for in the protective order in this action.

> Robert G. andmy U. B. D. J.