

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

ELM 3DS INNOVATIONS, LLC,)
)
 Plaintiff,)
)
 v.)
)
 SAMSUNG ELECTRONICS CO., LTD.,)
 SAMSUNG SEMICONDUCTOR, INC.,)
 SAMSUNG ELECTRONICS AMERICA,)
 INC., and SAMSUNG AUSTIN)
 SEMICONDUCTOR, LLC,)
)
 Defendants.)
)

C.A. No. 14-cv-01430-CJB

JURY TRIAL DEMANDED

NOTICE OF SUBPOENA TO JIMMY LU

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure Rules 26, 34, and 45, Defendants Samsung Electronics Co., Ltd., Samsung Semiconductor, Inc., Samsung Electronics America, Inc., and Samsung Austin Semiconductor, LLC (collectively, “Samsung”) intend to serve Mr. Jimmy Lu with (1) a subpoena to produce documents commanding production of documents, electronically stored information, or other tangible things as set forth in Exhibit A, and (2) a subpoena to testify at a deposition as set forth in Exhibit B.

PLEASE TAKE FURTHER NOTICE that the subpoena to produce documents compels the production of documents, information, or objects described in Exhibit A. The documents shall be produced at the time and location specified in the subpoena to produce documents, or at such alternative time and location as may be mutually agreed upon.

PLEASE TAKE FURTHER NOTICE that the deposition will be taken by stenographic, videographic, and/or remote means before a court reporter or other person authorized to administer oaths, and will be conducted at the time and location in the subpoena, or alternatively at a mutually agreed upon time and location. Samsung reserves the right to seek additional testimony on the Topics of Examination listed in Exhibit B in the event additional facts or documents become available after the conclusion of the deposition on this Notice.

DATED: April 13, 2022

Respectfully submitted,

OF COUNSEL:

Allan M. Soobert
Naveen Modi
Phillip W. Citroen
Koichiro Kidokoro
PAUL HASTINGS LLP
875 15th Street, N.W.
Washington, D.C. 20005
(202) 551-1700
allansoobert@paulhastings.com
naveenmodi@paulhastings.com
phillipcitroen@paulhastings.com
koichirokidokoro@paulhastings.com

Yar R. Chaikovsky
Philip Ou
Joseph J. Rumpler, II
PAUL HASTINGS LLP
1117 California Avenue
Palo Alto, CA 94304
(650) 320-1800
yarchaikovsky@paulhastings.com
philipou@paulhastings.com
josephrumpler@paulhastings.com

Elizabeth L. Brann
PAUL HASTINGS LLP
4747 Executive Drive, 12th Floor
San Diego, CA 92121
(858) 458-3000
elizabethbrann@paulhastings.com

Soyoung Jung
PAUL HASTINGS LLP
515 S. Flower Street, 25th Floor
Los Angeles, CA 90071
(213) 683-6000
soyoungjung@paulhastings.com

/s/ Adam W. Poff

YOUNG CONAWAY STARGATT &
TAYLOR, LLP
Adam W. Poff (No. 3990)
Pilar G. Kraman (No. 5199)
Rodney Square
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
apoff@ycst.com
pkraman@ycst.com

*Attorneys for Defendants Samsung Electronics
Co., Ltd., Samsung Semiconductor, Inc.,
Samsung Electronics America, Inc., and
Samsung Austin Semiconductor, LLC*

CERTIFICATE OF SERVICE

I, Adam W. Poff, hereby certify that on April 13, 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:

Joseph J. Farnan, Jr.
Brian E. Farnan
Michael J. Farnan
Farnan Law LLP
919 North Market Street, 12th Floor
Wilmington, DE 19801
farnan@farnanlaw.com
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

John M. Hughes
Nosson D. Knobloch
Katherine L.I. Hacker
Daniel C. Taylor
Bartlit Beck LLP
1801 Wewatta Street, Suite 1200
Denver, CO 80202
john.hughes@bartlitbeck.com
nosson.knobloch@bartlitbeck.com
kat.hacker@bartlitbeck.com
dan.taylor@bartlitbeck.com

Matthew R. Ford
Bartlit Beck LLP
54 W. Hubbard Street, Suite 300
Chicago, IL 60654
matthew.ford@bartlitbeck.com

Adam K. Mortara
Bartlit Beck LLP
125 South Wacker Dr., Suite 300
Chicago, IL 60606
adam@mortalalaw.com

Attorneys for Plaintiff Elm 3DS Innovations, LLC.

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

/s/ Adam W. Poff

Adam W. Poff (No. 3990)

Pilar G. Kraman (No. 5199)

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

Rodney Square

1000 North King Street

Wilmington, DE 19801

(302) 571-6600

apoff@ycst.com

pkraman@ycst.com

*Attorneys for Defendants Samsung Electronics Co.,
Ltd., Samsung Semiconductor, Inc., Samsung
Electronics America, Inc., and Samsung Austin
Semiconductor, LLC*

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.