

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ELM 3DS INNOVATIONS, LLC,
Plaintiff,
v.
SAMSUNG ELECTRONICS CO., LTD., et al.,
Defendants.

C.A. No. 14-cv-1430-CJB
JURY TRIAL DEMANDED

STIPULATION REGARDING IDENTICAL DIE IN ACCUSED PRODUCTS

Samsung stipulates as follows: In the chart below, the die in the product identified in the “Samsung Sample” column are identical in all respects relevant to the dielectric stress limitations of the Asserted Claims to the die from the same process node in the products identified in the “Identical Die Products” column. For the sake of clarity, the relevant node that is considered identical for purposes of this stipulation has been bolded in the “Identical Die Products” column.

Elm stipulates as follows: Samsung has represented that it has searched for but has not been able to locate physical samples from the following process nodes: D11, D14, D28, D46, D56, D68, D80, D92, D106, D123, D146, FN12, FN19, FN21, FN27, FN32, FN35, FN42, FN51, FN63, FN73, FN90, V24, and V32. Moreover, Samsung represents that it has made a reasonable search for samples of each of the Accused Products¹ and has produced samples of each Accused Product for which samples are in its possession, custody, or control. Based on Samsung’s representations, Elm agrees that it will not seek additional discovery relating to physical samples of Accused Products or wafers corresponding to any process node at issue in this case. However, Elm reserves the right to

¹ The currently accused products include the products listed in Exhibit A to the Representative Products Agreement (D.I. 443) and the Samsung products with above-50-micron die identified by Samsung in December 2021.

request that Samsung search for physical samples of Accused Products or process nodes that are added to the case at a later date.

Samsung Sample	Process Node(s)	Identical Die Products
KMGX6001BM-B5140Y0	D18, FN14-B	KMR210008A-A8090Y0 – Group 6 (D20, FN14-A) KLMAG1JENB-B0310Y3 – Group 8 (FN14-A) KLUDG8J1CB-B0B1008 – Group 24 (FN14-A) KMDH6001DM-B422005 - Group 30 (D18, V48) KMHC40010M-A810007 – Group 43 (D20, FN14-A) KLUDG8J1CB-C0B1T07 – Group 68 (FN14-A) KLUBG4G1BE-E0B10Y0 – Group 84 (FN14-A) The following products with die thicker than 50 microns: <ul style="list-style-type: none"> • K3UH5H50MM-NGCJ0EX (D18) • K3UH5H50MM-NGCJTIN (D18) • KMQ310013B-B4190Y0 (D20, FN14) • K9PHGY8S7E-1CK0TP1 (FN14) • KMQE10013M-B318T07 (D20, FN14) • KMFN10012A-B2140Y0 (D20, FN14) • KMFNX0012M-B214001 (D20, FN14) • KMQ310006B-B4190Y0 (D20, FN14) • KMRX1000BM-B614T07 (D20, FN14)

Samsung Sample	Process Node(s)	Identical Die Products
K3QF4F40BM-AGCF000	D20	<p>KMR210008A-A8090Y0 - Group 6 (D20, FN-14A)</p> <p>KMWV50017M-B812004 - Group 10 (D20, V48)</p> <p>KHA884901X-MC13TNX - Group 16 (D20)</p> <p>KMQ310006A-B419001 - Group 18 (D20, FN16)</p> <p>K3RG2G20BM-CGCH000 - Group 27 (D20)</p> <p>KMHC40010M-A810007 - Group 43 (D20, FN14-A)</p> <p>KMFR20012M-A305000 - Group 47 (D20, FN16)</p> <p>KMRV50014M-B809T04 - Group 61 (D20, V48)</p> <p>The following products with die thicker than 50 microns:</p> <ul style="list-style-type: none"> • K3RG1G10BM-BGCH0P3 (D20) • KHA883901B-MC12TFM (D20) • KHA843801B-MC12TNV (D20) • KHA883901B-MC12TNV (D20) • KHA843801B-MC12TAM (D20) • K3RG1G10BM-KGCHTP4 (D20) • K3RG2G20BM-DGCHTTN (D20) • KHA883901B-MC12TAM (D20) • KMQ310013B-B4190Y0 (D20, FN14) • K3RG2G20BM-CGCJT TN (D20) • KHA841801B-MC12TDM (D20) • KMFN10012M-B2140Y0 (D20, FN16) • KMQ310013M-B4190Y0 (D20, FN16) • K3RG2G20BM-MGCJT TN (D20) • KHA843801B-MC12TFM (D20) • KMQE10013M-B318T07 (D20, FN14) • K4EHE304EA-AGCF TT N (D20) • KHA844801B-MC42TIC (D20) • KMFN10012A-B2140Y0 (D20, FN14) • K3RG2G20CM-CGCJT TN (D20) • K3RG2G20BM-MGCJ000 (D20) • KMFNX0012M-B214001 (D20, FN14) • KHA841801B-MC12T00 (D20) • K3RG2G20CM-MGCJT TN (D20) • KMQ310013M-B419TMO (D20, FN16) • K4FHE3D4HM-AGCJT TN (D20) • KMQ310006B-B4190Y0 (D20, FN14) • KHA881901B-MC12TEM (D20) • KMRX1000BM-B614T07 (D20, FN14)

Samsung Sample	Process Node(s)	Identical Die Products
K4B8G0446D-MYK0000	D25	<p>KMR210008M-A8050Y0 - Group 26 (D25, FN16) KMR31000BM-B611T01 - Group 42 (D25, FN16) KMR4Z0001A-B803002 - Group 60 (D25, FN19) K3MF8F80DM-MGCE000 - Group 77 (D25) KMR2W0008M-A8030YE - Group 87 (D25, FN19)</p> <p>The following products with die thicker than 50 microns:</p> <ul style="list-style-type: none"> • K3RG3G30MM-DGCH000 (D25) • K3QF7F70DM-QGCETTN (D25) • K3QF7F70DM-HGCE0EX (D25) • K3RG3G30MM-DGCHTTN (D25) • K4E6E304ED-EGCE000 (D25) • K3MF9F90MM-MGCETMB (D25) • K3QF2F20DM-CGCBTTN (D25) • KMR310008M-A6110Y0 (D25, FN16) •
KLMCG8GESD-B03P017	FN16	<p>KMR310001M-B6110Y0 - Group 12 (D23, FN16) KMQ310006A-B419001 - Group 18 (D20, FN16) KMR210008M-A8050Y0 - Group 26 (D25, FN16) KMR31000BM-B611T01 - Group 42 (D25, FN16) KMFR20012M-A305000 - Group 47 (D20, FN16) MBMPCGVFODGW-FKE01 (KDBCK8VWHD-UEQ1M01) - Group 51 (FN16) KLUCG8G1BD-E0B10Y2 - Group 65 (FN16) KLUDGAG1BD-E0B10Y2 - Group 158 (FN16)</p> <p>The following products with die thicker than 50 microns:</p> <ul style="list-style-type: none"> • KMFN10012M-B2140Y0 (D20, FN16) • KMQ310013M-B4190Y0 (D20, FN16) • KMQN1000SM-B316T01 (D23, FN16) • KMQN1000SM-B3160Y0 (D23, FN16) • KLUBG4G1BD-E0B20Y3 (FN16) • KMQ310013M-B419TMO (D20, FN16) • KMR310008M-A6110Y0 (D25, FN16)

Samsung Sample	Process Node(s)	Identical Die Products
K9VKGA8J1M-1CK0000	V48	KMWV50017M-B812004 - Group 10 (D20, V48) KLAEG8KWAM-I0T3T00 - Group 21 (V48) KMDH6001DM-B422005 - Group 30 (D18, V48) KLMCG2KETM-B041T02 - Group 38 (V48) KMRV50014M-B809T04 - Group 61 (D20, V48) The following products with die thicker than 50 microns: <ul style="list-style-type: none"> • K9HKGY8S5M-1CE0TP1 (V48) • K9PMGY8S7M-1CE0TP1 (V48)
KLAFGAKWCA-E4T20P8	V64	K9OMGY8H5A-CCK0000 - Group 17 (V64)

Dated: April 13, 2022

FARNAN LLP

/s/ Michael J. Farnan

Brian E. Farnan (#4089)
 Michael J. Farnan (#5165)
 919 North Market Street
 12th Floor
 Wilmington, DE 19801
 Tel: (302) 777-0300
 Fax: (302) 777-0301
 bfarnan@farnanlaw.com
 mfarnan@farnanlaw.com

Attorneys for Plaintiff Elm 3DS Innovations, LLC

Respectfully submitted,

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Adam W. Poff

Adam W. Poff (#3990)
 Pilar G. Kraman (#5199)
 Rodney Square
 1000 North King Street
 Wilmington, DE 19801
 Telephone: (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

IT IS SO ORDERED

Date:

 The Honorable Christopher J. Burke