



May 13, 2022

VIA E-FILING

The Honorable Christopher J. Burke
J. Caleb Boggs Federal Building
844 N. King Street
Unit 28, Room 2325
Wilmington, DE 19801

**RE: *Elm 3DS Innovations, LLC v. Samsung Electronics Co., Ltd. et al.*,
(C.A. No. 14-cv-1430-CJB)**

Dear Judge Burke:

The parties in the above-referenced matter write to request the scheduling of a discovery teleconference.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer by telephone on May 13, 2022:

Delaware Counsel: Michael Farnan for Plaintiff and Adam Poff for Defendants

Lead Counsel: Nosson Knobloch for Plaintiff and Allan Soobert and Phillip Citroen for Defendants

The disputes requiring judicial attention are listed below:

1. Elm's request for documents related to Samsung's warpage-measurement procedures for the accused products, including when and how Samsung takes those measurements.
2. Elm's request for Samsung's document-retention policies, including but not limited to policies related to the retention of warpage-measurement data.

Respectfully submitted,

/s/ Michael J. Farnan

Michael J. Farnan

cc: Counsel of Record (via E-File)

010N MARKET STREET, 12TH FLOOR, WILMINGTON, DE 19801