

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

UNIVERSITY OF MASSACHUSETTS
and CARMEL LABORATORIES, LLC,

Plaintiffs,

v.

L'ORÉAL USA, INC.,

Defendant.

C.A. No. 17-cv-868-CFC-SRF

**MOTION FOR TELECONFERENCE TO RESOLVE
DISCOVERY DISPUTE**

The parties respectfully move this Court to schedule a teleconference to address outstanding disputes regarding the following discovery matters:

- Plaintiffs' request that Defendant remedy the deficiencies in its December 20, 2019 production pursuant to Paragraph 6 of the Scheduling Order and the Court's February 18, 2020 Order.
- Plaintiffs' request that Defendant identify the custodians whose files were searched for emails and other Electronically Stored Information.
- Plaintiffs' request that Defendant produce documents pursuant to Plaintiffs' Requests for Production No. 8, 25, 49, 50, and 65.
- L'Oréal USA's request that Plaintiffs produce documents responsive to L'Oréal USA's Request for Production Nos. 11, 30-33, 45, 84, 87, 92, 94, 95, 100.

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 the following dates:
March 3 and 12, 2020.

Delaware Counsel for Plaintiffs:

Rosemary Piergiovanni
Farnan LLP

Lead Counsel for Plaintiffs:

Tamar Lusztig
Beatrice Franklin
Susman Godfrey LLP

Delaware Counsel for Defendant:

Kate Mowery
Richards Layton & Finger PA

Lead Counsel for Defendant:

Dennis Ellis
Katherine F. Murray
Serli Polatoglu
Paul Hastings LLP

The parties are available for a teleconference on the following dates:

- March 26, 2020
- March 27, 2020

Dated: March 13, 2020

Respectfully submitted,

FARNAN LLP

Richards, Layton & Finger, P.A.

/s/ Brian E. Farnan

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