

**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.

Case No. 17-cv-868-CFC-SRF

**NOTICE OF DEPOSITION PURSUANT TO RULE 30(b)(1)**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, on June 18, 2020, via remote deposition software, counsel for the University of Massachusetts and Carmel Laboratories, LLC will take the videotaped deposition of Ali Goldstein.

The deposition will be taken before a Notary Public or some other officer authorized by law to administer oaths, who will appear remotely, for use at trial. The above deposition will be recorded by stenographic means, audiotaped, videotaped, and/or transcribed using realtime interactive transcription (e.g., LiveNote). Further, given the deposition will be taken remotely, it may feature instant audio and visual display of each participant, include real-time electronic recording and capture of exhibits, and utilize paperless exhibit display. The deposition will continue from day to day until completed.

DATED: June 3, 2020

Respectfully submitted,

FARNAN LLP

/s/ Brian E. Farnan

Brian E. Farnan (Bar No. 4089)  
Michael J. Farnan (Bar No. 5165)  
919 North Market Street, 12<sup>th</sup> Floor  
Wilmington, DE 19801  
Telephone: (302) 777-0300  
Facsimile: (302) 777-0301  
bfarnan@farnanlaw.com  
mfarnan@farnanlaw.com

Of Counsel:

William Christopher Carmody  
Tamar E. Lusztig  
Beatrice C. Franklin  
SUSMAN GODFREY L.L.P.  
1301 Avenue of the Americas, 32<sup>nd</sup> Floor  
New York, NY 10019  
Telephone: (212) 336-8330  
Facsimile: (212) 336-8340  
bcarmody@susmangodfrey.com  
tlusztig@susmangodfrey.com  
bfranklin@susmangodfrey.com

Justin A. Nelson  
SUSMAN GODFREY L.L.P.  
1000 Louisiana Street, Suite 5100  
Houston, Texas 77002  
Telephone: (713) 651-9366  
Facsimile: (713) 654-6666  
jnelson@susmangodfrey.com

*Attorneys for University of Massachusetts  
and Carmel Laboratories, LLC*

Matthew B. Lowrie  
FOLEY & LARDNER LLP  
111 Huntington Avenue, Suite 2600  
Boston, MA 02199  
Telephone: (617) 342-4000

Facsimile: (617) 342-4001  
mlowrie@foley.com

*Attorneys for Carmel Laboratories, LLC*

COMMONWEALTH OF MASSACHUSETTS,

By its attorney,

MAURA HEALEY  
ATTORNEY GENERAL

By: William Christopher Carmody  
William Christopher Carmody  
Special Assistant Attorney General  
SUSMAN GODFREY L.L.P.  
1301 Avenue of the Americas, 32<sup>nd</sup> Floor  
New York, NY 10019  
Telephone: (212) 336-8330  
Facsimile: (212) 336-8340  
bcarmody@susmangodfrey.com

*Attorney for University of Massachusetts  
Medical School*