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

UNIVERSITY OF MASSACHUSETTS and CARMEL LABORATORIES, LLC,

Plaintiffs,

v.

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

L'ORÉAL USA, INC.,

Defendant.

# 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 16, 2020, via remote deposition software, counsel for the University of Massachusetts and Carmel Laboratories, LLC will take the videotaped deposition of Jean-Baptiste Galey.

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

