

**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 TO RESOLVE DISCOVERY DISPUTE

Plaintiffs move this Court to address outstanding disputes regarding the following discovery matters:

- Plaintiffs' request for Defendant to produce certain information regarding foreign sales of products containing adenosine that are developed, tested, and/or manufactured in the United States. This issue includes producing sufficient information regarding those sales, a 30(b)(6) deposition on related topics, and supplementing Interrogatory 3 to identify relevant products.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in verbal meet-and-confers by telephone on the following dates: June 29, 2020 and July 8, 2020.

Delaware Counsel for Plaintiffs:

Michael Farnan
Farnan LLP

Lead Counsel for Plaintiffs:

Justin Nelson
Nicholas Carullo
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Delaware Counsel for Defendant:

Kate Mowery
Richards Layton & Finger PA

Lead Counsel for Defendant:

Dennis Ellis
Katherine F. Murray
Serli Polatoglu
Browne George Ross LLP
Eric Dittmann
Isaac Ashkenazi
Paul Hastings LLP

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

- August 5, 2020
- August 10, 2020
- August 11, 2020

Dated: July 28, 2020

FARNAN LLP

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Respectfully submitted,

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