

**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 DISPUTES**

Plaintiffs and Defendant 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
- Defendant's request that the Court move the document production deadline from February 7, 2020 to March 6, 2020.

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: January 14, 2020, and January 30, 2020.

Delaware Counsel for Plaintiffs:

Brian Farnan
Michael Farnan
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 E. Ellis

Katherine F. Murray
Serli Polatoglu
Isaac Ashkenazi
Paul Hastings LLP

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

- February 11, 2020
- February 14, 2020
- February 18, 2020

Dated: February 4, 2020

FARNAN LLP

/s/ Brian E. Farnan
Brian E. Farnan (Bar No. 4089)
Michael J. Farnan (Bar No. 5165)
919 N. Market St., 12th Floor
Wilmington, DE 19801
(302) 777-0300
(302) 777-0301 (Fax)
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

Attorneys for Plaintiffs

Respectfully submitted,

Richards, Layton & Finger, P.A.

/s/ Katharine L. Mowery
Frederick L. Cottrell, III (#2555)
Jeffrey L. Moyer (#3309)
Katharine L. Mowery (#5629)
One Rodney Square
920 N. King Street
Wilmington, Delaware 19801
(302) 651-7700
cottrell@rlf.com
moyer@rlf.com
mowery@rlf.com

Attorneys for Defendant L'Oréal USA, Inc.