

**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)(6)**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, on March 12, 2020, at the offices of Susman Godfrey LLP, 1301 Avenue of the Americas, New York, New York, counsel for the University of Massachusetts and Carmel Laboratories, LLC, will take the videotaped deposition(s) of the designated representative(s) of L'Oréal USA, Inc., best able to testify as to Topics 41-48 and 50-53 set forth in Exhibit 1 to Plaintiffs' Notice of Deposition Pursuant to Rule 30(b)(6) served on February 7, 2020. L'Oréal USA, Inc., has a duty to designate one or more officers, directors, managing agents, or other persons with sufficient knowledge to testify fully regarding those topics. No later than ten business days prior to the deposition, L'Oréal USA, Inc., shall identify the person(s) who will testify on its behalf pursuant to this notice and the matter(s) about which each person will testify.

The deposition(s) will be taken before a Notary Public or some other officer authorized by law to administer oaths for use at trial. The above deposition(s) will be videotaped and will continue from day to day until completed.

DATED: February 21, 2020

Respectfully submitted,

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