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BRAGALONE CONROY PC

July 28, 2015

Jamie Beaber
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Re: *Delaware Display Group, LLC and Innovative Display Technologies LLC v. LG Electronics, Inc., LG Electronics U.S.A., Inc., LG Display Co., Ltd., and LG Display America, Inc.*; C.A. No. 1:13-cv-2109-RGA

Dear Jamie:

Based on the LG defendants' insufficient document production, Plaintiffs will be moving the Court to compel compliance. The parties met and conferred on July 16, and the LG defendants promised a production that would address Plaintiffs' complaints regarding outstanding discovery aside from the CAD file issue. As you know, Plaintiffs served their first document requests on December 12, 2014; therefore, LG's document production was due several months ago. The identification and collection of the requested information should have, likewise, been completed months ago. But last week's production by the LG defendants did little to advance the ball, and provides further proof that the LG defendants intend to drag their feet and slow play discovery unless the Court intervenes. This tactic is clear from the recent production where 71 of the 85 documents collectively produced by the LG defendants were public SEC filings or foreign language documents. Many necessary and responsive documents remain outstanding.

For example, the LG Display defendants have yet to produce financial information, other than publically available SEC filings. Further, while some information was produced by the LG Electronics defendants for the accused phones and tablets, no information was produced regarding other accused products, such as televisions and monitors.

In addition, the LG defendants have yet to produce a single license agreement. And no supplier agreements have been produced for the BLUs or LCMs that the LG defendants do not manufacture. These documents were requested in Plaintiffs initial RFPs to the LG defendants, and these deficiencies were pointed out in Pat Conroy's April 3, 2015 letter.

Accordingly, the parties are at an impasse, and Plaintiffs will be seeking the Court's assistance in bringing the LG defendants into compliance with their discovery obligations.

Sincerely,

A handwritten signature in blue ink, appearing to read 'James R. Perkins'.

James R. Perkins