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# EXHIBIT 1

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**From:** Will Ellerman  
**Sent:** Tuesday, December 12, 2017 7:54 PM  
**To:** Moseley, Steven  
**Cc:** Team Samsung; Melissa R. Smith; Christopher Evans; Ari Rafilson; Alfonso G Chan; Paul Beeler; Rhonda Polvado; Andrew Huffstetler; Caroline Johnson  
**Subject:** Re: CyWee v. Samsung: CyWee's Motion to Compel

Yes. I will send dial-in information in the morning.

On Dec 12, 2017, at 7:21 PM, Moseley, Steven <[stevenmoseley@paulhastings.com](mailto:stevenmoseley@paulhastings.com)> wrote:

Will,

Given the simplicity of the disputed issue and CyWee's failure to provide a basis for its position, a hotline call is not yet warranted. Instead of prematurely involving the Court, we suggest that the parties first meet and confer so CyWee can provide its grounds for refusing to withdraw its motion. If the parties cannot resolve this dispute after meaningfully meeting and conferring, we will agree to follow the procedures set forth in Section 9(c) of the Discovery Order regarding "hot-line" disputes.

Thank you for providing your availability. Does 10am PT work for you?

Best regards,

Steve

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**Steven P. Moseley | Associate, Litigation Department**  
Paul Hastings LLP | 4747 Executive Drive, Twelfth Floor, San Diego, CA 92121 | Direct: +1.858.458.3012 | Main: +1.858.458.3000 | Fax: +1.858.458.3112 | [stevenmoseley@paulhastings.com](mailto:stevenmoseley@paulhastings.com) | [www.paulhastings.com](http://www.paulhastings.com)

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**From:** Will Ellerman [<mailto:wellerman@ShoreChan.com>]  
**Sent:** Tuesday, December 12, 2017 4:56 PM  
**To:** Moseley, Steven  
**Cc:** Team Samsung CyWee; Melissa R. Smith; Christopher Evans; Ari Rafilson; Alfonso G Chan; Paul Beeler; Rhonda Polvado; Andrew Huffstetler; Caroline Johnson  
**Subject:** [EXT] Re: CyWee v. Samsung: CyWee's Motion to Compel

Steven,

I am available tomorrow morning. As Chris suggested, a hotline call seems appropriate.

Will

On Dec 12, 2017, at 6:27 PM, Moseley, Steven <[stevenmoseley@paulhastings.com](mailto:stevenmoseley@paulhastings.com)> wrote:

Will,

Please let me know your availability this evening and tomorrow morning to meet and confer regarding CyWee's refusal to abide by the Court's Standing Order. I am free whenever works best for you until 8:00pm PT tonight or between 9:00am-12:00pm PT tomorrow.

Best regards,

Steve

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 **Steven P. Moseley | Associate, Litigation Department**  
Paul Hastings LLP | 4747 Executive Drive, Twelfth Floor, San Diego, CA 92121 | Dir: +1.858.458.3012 | Main: +1.858.458.3000 | Fax: +1.858.458.3112 | [stevenmoseley@paulhastings.com](mailto:stevenmoseley@paulhastings.com) | [www.paulhastings.com](http://www.paulhastings.com)

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**From:** Will Ellerman [<mailto:wellerman@ShoreChan.com>]  
**Sent:** Tuesday, December 12, 2017 3:38 PM  
**To:** Brann, Elizabeth L.  
**Cc:** Team Samsung CyWee; Melissa R. Smith; Christopher Evans; Ari Rafilson; Alfonso G Chan; Paul Beeler; Rhonda Polvado; Andrew Huffstetler; Caroline Johnson  
**Subject:** [EXT] FW: CyWee v. Samsung: CyWee's Motion to Compel

Liza,

I am responding to your email to Chris below. We do not believe the Motion to Compel exceeds the applicable page limits, or that it should be re-filed. Of course, the motion could be shortened (or perhaps even obviated) if Samsung would answer the interrogatories instead of requiring CyWee to seek Court intervention.

Regards,

Will



Will Ellerman  
Shore Chan DePumpo LLP  
901 Main Street, Suite 3300  
Dallas, Texas 75202  
214-593-9121 (Direct)  
214-593-9110 (Firm)  
214-593-9111 (Fax)

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**From:** Brann, Elizabeth L. [<mailto:elizabethbrann@paulhastings.com>]  
**Sent:** Tuesday, December 12, 2017 3:51 PM  
**To:** Christopher Evans <[cevens@ShoreChan.com](mailto:cevens@ShoreChan.com)>  
**Cc:** Team Samsung <[TeamSamsungCywee@paulhastings.com](mailto:TeamSamsungCywee@paulhastings.com)>; Melissa R. Smith <[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)>; Ari Rafilson <[arafilson@ShoreChan.com](mailto:arafilson@ShoreChan.com)>; Alfonso G Chan <[achan@ShoreChan.com](mailto:achan@ShoreChan.com)>; Paul Beeler <[pbeeler@ShoreChan.com](mailto:pbeeler@ShoreChan.com)>; Rhonda Polvado <[rpolvado@ShoreChan.com](mailto:rpolvado@ShoreChan.com)>; Andrew Huffstetler <[ahuffstetler@ShoreChan.com](mailto:ahuffstetler@ShoreChan.com)>; Caroline Johnson <[cjohnson@ShoreChan.com](mailto:cjohnson@ShoreChan.com)>  
**Subject:** CyWee v. Samsung: CyWee's Motion to Compel

Chris,


CyWee's Motion to Compel Interrogatory Responses (Dkt. No. 49) violates the page limits prescribed in the Court's June 3, 2016 Standing Order Regarding "Meet and Confer" Obligations Relating To Discovery Disputes. The Standing Order states that "[an] opposed discovery related motion, or any response thereto, shall not exceed 7 pages" and attachments "shall not exceed 5 pages." CyWee's motion is almost 9 pages long and contains more than 80 pages of attachments.

Please confirm by tomorrow morning that CyWee will withdraw its motion and seek leave of the Court to re-file in compliance with the Standing Order. If CyWee refuses, Defendants intend to file a motion to strike CyWee's motion to compel.

Best regards,

Liza

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 **Elizabeth L. Brann** | Partner, Litigation Department  
Paul Hastings LLP | 4747 Executive Drive, Twelfth Floor, San Diego, CA 92121 | Direct: +1.858.458.3014 | Main: +1.858.458.3000 | Fax: +1.858.458.3005 | [elizabethbrann@paulhastings.com](mailto:elizabethbrann@paulhastings.com) | [www.paulhastings.com](http://www.paulhastings.com)

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