









Asserted Patents. Mr. Kennedy had the luxury of a full and frank conversation with Dr. Pryor about his approach to the very license negotiations that are the subject of Samsung's Motion. Samsung respectfully requests that the Court grant its motion for leave to file a Reply so that it may have an equal chance to address the new evidence raised by GTP's damages expert.

For the foregoing reasons, Samsung respectfully requests that the Court grant its motion for leave to file a Reply in support of its Motion to Compel Responsive Documents, Dkt. 100.

DATED: November 10, 2021

Respectfully submitted,

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### **CERTIFICATE OF CONFERENCE**

Pursuant to Local Rules CV-7(h) and (i), counsel for Defendants met and conferred with counsel for Plaintiff. On November 8, 2021, Defendants emailed Plaintiff stating their intention to file the present motion, and requested Plaintiff's position and its availability to meet and confer. On November 9, having received no response from Plaintiff, Defendants followed up with the same requests. Plaintiff responded, asking for Defendants' position in writing, and Defendants provided it. On November 10, Plaintiff stated that it opposes the present motion. The parties are thus at an impasse. No agreement could be reached after good faith attempts to resolve the matters raised by this motion, leaving an open issue for the Court to resolve.

/s/ Christopher W. Kennerly  
Christopher W. Kennerly

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