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October 10, 2016

VIA CM/ECF & HAND DELIVERY

The Honorable Christopher J. Burke
United States District Court
District of Delaware
844 King Street
Wilmington, DE 19801

**Re: *ELM 3DS Innovations, LLC v. Samsung Electronics Co., Ltd., et al.,*
(C.A. No. 14-1430-LPS-CJB)
ELM 3DS Innovations, LLC v. Micron Technology, Inc., et al.,
(C.A. No. 14-1431-LPS-CJB)
ELM 3DS Innovations, LLC v. SK Hynix Inc., et al.,
(C.A. No. 14-1432-LPS-CJB)**

Dear Judge Burke:

Pursuant to Local Rule 7.1.2(b), the parties in the above-referenced matters write to inform the Court of recent developments relevant to the 16 petitions with the Patent Trial and Appeal Board (“PTAB”) for *inter partes* review (“IPR”) of each of the 13 patents-in-suit, all of which claim priority to a common ancestor and share an identical specification. (D.I. 88 at 2-3). As previously reported, on June 30 and July 1, 2016, the PTAB had, at that point, instituted IPR on all asserted claims for eight of the thirteen patents-in-suit: U.S. Patent Nos. 8,841,778, 7,193,239, 8,410,617, 7,504,732, 8,035,233, 8,796,862, 8,653,672, and 8,629,542. More recently, on August 30, 2016, the PTAB instituted IPR on all asserted claims for U.S. Patent Nos. 8,928,119 and 7,474,004. On September 28, 2016, the PTAB instituted IPR on claim 1 for U.S. Patent No. 8,907,499, but declined to institute on claim 49. The PTAB instituted IPR on all asserted claims for U.S. Patent No. 8,933,570 on October 4, 2016. Finally, on September 6, 2016, the PTAB declined to institute IPR for U.S. Patent No. 8,791,581. Thus, there are 14 IPR proceedings pending for 12 patents-in-suit and the PTAB has now issued decisions on all 16 petitions.

In light of the decisions by the PTAB and for the reasons stated in the moving papers, the parties respectfully request that the case remain stayed and the parties will provide status reports to the Court every 90 days.

Should the Court have any questions, counsel is available at the Court’s convenience.

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Respectfully,

/s/ Frederick L. Cottrell, III

Frederick L. Cottrell, III (#2555)

cc: All Counsel of Record (via CM/ECF)