IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

In re Chien-Min Sung Subpoena Upon 3M Company	C.A. No. 23-mc-00104-JFD

RESPONDENT CHIEN-MIN SUNG'S CROSS MOTION TO COMPEL AND FOR SANCTIONS

Pursuant to Rules 37 and 45 of the Federal Rules of Civil Procedure, Respondent Dr. Chien-Min Sung ("Dr. Sung") hereby moves the Court to compel Movant 3M Company ("3M") to produce documents and testimony responsive to the subpoena issued to 3M in *Chien-Min Sung v. Texas Instruments, Inc*., No. 4:23-cv-753-SDJ, pending in the U.S. District Court for the Eastern District of Texas. Dr. Sung also moves the Court to award him all reasonable expenses, including attorney's fees and costs, incurred by Dr. Sung in opposing 3M's Motion to Quash improperly filed in this District. Dr. Sung's Cross-Motion relies on the accompanying Memorandum of Law.

Dated: November 22, 2023

s/ Jessica M. A. Thomas

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