

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LAM RESEARCH CORP.,
Petitioner,

v.

INPRIA CORP.,
Patent Owner.

Case IPR2025-00309
Patent No. 11,537,048

**DECLARATION OF JOHN V. GORMAN IN SUPPORT OF
MOTION TO CORRECT FILING DATE OR,
ALTERNATIVELY, DEEM PETITION TIMELY**

I, John V. Gorman, declare as follows:

1. I am a partner at Morgan, Lewis & Bockius LLP and work with Dion Bregman, who is designated as lead counsel for Petitioner. I submit this declaration in support of Petitioner's Motion to Correct Filing Date or, Alternatively, Deem Petition Timely in Case IPR2025-00309.

2. I am admitted to the Bar of the U.S. District Court for the District of Delaware by the Supreme Court of the State of Delaware.

3. On January 17, 2023, I filed a Notice of Appearance on behalf of Lam Research Corp. in the matter of *Inpria Corporation v. Lam Research Corporation*, Case No. 1:22-cv-01359 pending before the U.S. District Court for the District of Delaware (hereinafter, "the District Court Matter").

4. The original Complaint in the District Court Matter was filed by Inpria Corporation against Lam Research Corporation on October 14, 2022, alleging infringement of three patents: U.S. Patent No. 10,732,505, U.S. Patent No. 9,823,564 and U.S. Patent No. 9,310,684 (hereinafter, "the original three patents"). The original Complaint did not allege infringement of U.S. Patent No. 11,537,048.

5. On December 13, 2023, Inpria Corporation filed an Amended Complaint against Lam Research Corporation alleging infringement of the original three patents, as well as infringement of five additional patents, including U.S. Patent No. 11,537,048.

6. I understand that, on August 16, 2022, the U.S. District Court for the District of Delaware revised its Administrative Procedures Governing Filing and Service by Electronic Means “to reflect a new filing and service deadline of 5:00 p.m. Eastern Time for all documents other than initial pleadings.” The applicable Order states in relevant part: “Aside from initial pleadings, all electronic transmissions of documents (including, but not limited to, motions, briefs, appendices, and discovery responses) must be completed by 5:00 p.m. Eastern Time, in order to be considered timely filed and service that day.” The Order is available at the following URL: <https://www.ded.uscourts.gov/sites/ded/files/news/Revision%20to%20ECF%20Filing%20Deadline%208-16-22.pdf>

7. I understand that Rule 5.2(a) of the Local Civil Rules for the District of Delaware states: “If all parties to a case are participants in CM/ECF, the Court’s Notice of Electronic Filing (‘NEF’), automatically generated for each document filed, shall serve as the certificate of service; *i.e.*, no separate certificate of service shall be filed.”

8. I understand that the Administrative Procedures Governing Filing and Service by Electronic Means for the U.S. District Court for the District of Delaware states in Section (D)(1) as follows: “A document filed electronically shall be deemed filed at the time and date stated on the NEF received from the Court.”

9. I understand that the Administrative Procedures Governing Filing and Service by Electronic Means for the U.S. District Court for the District of Delaware states in Section (E)(1) as follows: “Whenever a pleading or other document is filed electronically, CM/ECF will automatically generate and send a NEF to the user and to all other attorneys or parties of record who are registered as users in CM/ECF. The user(s) shall retain a paper or digital copy of the NEF, which shall serve as the Court’s datestamp and proof of filing.”

10. I understand that the Administrative Procedures Governing Filing and Service by Electronic Means for the U.S. District Court for the District of Delaware states in Section (E)(2) as follows: “Transmission of the NEF shall constitute service of the filed document and shall be deemed to satisfy the requirements of Fed. R. Civ. P. 5(b)(2)(D), Fed. R. Civ. P. 77(d), Fed. R. Crim. P. 49(b) and D. Del. LR 5.2.”

11. Attached as Exhibit A to this Declaration is a true and correct copy of the docket sheet for the District Court Matter as of April 28, 2025.

12. Attached as Exhibit B to this Declaration is a true and correct copy of the NEF for Inpria Corporation’s Amended Complaint, which shows the time and date as “12/13/2023 at 5:03 PM EST.” The Amended complaint is not an initial pleading, as it was an amended version of the original Complaint, which was filed over a year before on October 14, 2022.

I declare that all statements made herein of my own knowledge are true; that

all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001.

Dated: May 2, 2025

/s/ John V. Gorman

John V. Gorman

EXHIBIT A

**U.S. District Court
District of Delaware (Wilmington)
CIVIL DOCKET FOR CASE #: 1:22-cv-01359-CJB**

Inpria Corporation v. Lam Research Corp.
Assigned to: Judge Christopher J. Burke
Cause: 35:1 Patent Infringement

Date Filed: 10/14/2022
Jury Demand: Plaintiff
Nature of Suit: 830 Patent
Jurisdiction: Federal Question

Plaintiff**Inpria Corporation**

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Date Filed	#	Docket Text
10/14/2022	1	COMPLAINT filed with Jury Demand against Lam Research Corp. (Filing fee \$ 402, receipt number ADEDC-3982763.) - filed by Inpria Corporation. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G, # 8 Civil Cover Sheet)(mpb) (Entered: 10/14/2022)
10/14/2022	2	Notice, Consent and Referral forms re: U.S. Magistrate Judge jurisdiction. (mpb) (Entered: 10/14/2022)
10/14/2022	3	Report to the Commissioner of Patents and Trademarks for Patent/Trademark Number(s) U.S. 10,732,505 ;U.S. 9,823,564 ;U.S. 9,310,684. (mpb) (Entered: 10/14/2022)
10/14/2022	4	Disclosure Statement pursuant to Rule 7.1: identifying Corporate Parent JSR Corporation for Inpria Corporation filed by Inpria Corporation. (mpb) (Entered: 10/14/2022)
10/14/2022	5	Summons Issued as to Lam Research Corp. on 10/14/2022. (mpb) (Entered: 10/14/2022)
10/14/2022	6	MOTION for Pro Hac Vice Appearance of Attorney Michael R. Headley - filed by Inpria Corporation. (Mabey, Warren) (Entered: 10/14/2022)
10/18/2022	7	SUMMONS Returned Executed by Inpria Corporation.Lam Research Corp. served on 10/17/2022, answer due 11/7/2022. (Mabey, Warren) (Entered: 10/18/2022)
10/19/2022		Case Assigned to Judge Colm F. Connolly. Please include the initials of the Judge (CFC) after the case number on all documents filed. (nms) (Entered: 10/19/2022)

10/19/2022		SO ORDERED, re 6 MOTION for Pro Hac Vice Appearance of Attorney Michael R. Headley filed by Inpria Corporation. Signed by Judge Colm F. Connolly on 10/19/2022. (nmf) (Entered: 10/19/2022)
10/20/2022		Pro Hac Vice Attorney Michael R. Headley for Inpria Corporation added for electronic noticing. Pursuant to Local Rule 83.5 (d), Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (mpb) (Entered: 10/20/2022)
11/03/2022	8	Joint STIPULATION TO EXTEND TIME for Defendant to Move, Answer, or Otherwise Respond to the Complaint to December 22, 2022 - filed by Lam Research Corp.. (Dudash, Amy) (Entered: 11/03/2022)
11/03/2022		SO ORDERED, re 8 Joint STIPULATION TO EXTEND TIME for Defendant to Move, Answer, or Otherwise Respond to the Complaint to December 22, 2022, filed by Lam Research Corp. Reset Answer Deadlines: Lam Research Corp. answer due 12/22/2022. Ordered by Judge Colm F. Connolly on 11/3/2022. (kmd) (Entered: 11/03/2022)
12/20/2022	9	Joint STIPULATION TO EXTEND TIME for Defendant to Move, Answer, or Otherwise Respond to the Complaint to January 23, 2023 - filed by Lam Research Corp.. (Dudash, Amy) (Entered: 12/20/2022)
12/20/2022		SO ORDERED, re 9 Joint STIPULATION TO EXTEND TIME for Defendant to Move, Answer, or Otherwise Respond to the Complaint to January 23, 2023, filed by Lam Research Corp. Reset Answer Deadlines: Lam Research Corp. answer due 1/23/2023. Ordered by Judge Colm F. Connolly on 12/20/2022. (kmd) (Entered: 12/20/2022)
01/17/2023		ORAL ORDER: It is HEREBY ORDERED that on or before January 24, 2023, the parties shall either (1) submit to the Clerk of Court an executed Form AO 85 Notice, Consent, and Reference of a Civil Action to a Magistrate Judge, indicating their consent to have a United States Magistrate Judge conduct all proceedings in this case including trial, the entry of final judgment, and post-trial proceedings; or (2) file a joint letter indicating that all the parties do not consent to a referral of this action to a Magistrate Judge. The letter should not indicate which party or parties did not consent. If all the parties consent, the case will be referred to Magistrate Judge Burke. Because of the Court's caseload, if the parties do not consent, the Court intends to assign the case to a visiting judge from another district. Ordered by Judge Colm F. Connolly on 1/17/2023. (nmf) (Entered: 01/17/2023)
01/17/2023	10	NOTICE of Appearance by John V. Gorman on behalf of Lam Research Corp. (Gorman, John) (Entered: 01/17/2023)
01/20/2023	11	NOTICE of Appearance of Michael L. Vild and Christopher Page Simon on behalf of Lam Research Corp. (Simon, Christopher) Modified on 1/20/2023 (kmd). (Entered: 01/20/2023)
01/20/2023	12	MOTION to Disqualify Counsel //Motion to Disqualify Fish & Richardson P.C. as Counsel to the Plaintiff - filed by Lam Research Corp.. (Attachments: # 1 Text of Proposed Order)(Simon, Christopher) (Entered: 01/20/2023)
01/20/2023	13	OPENING BRIEF in Support re 12 MOTION to Disqualify Counsel //Motion to Disqualify Fish & Richardson P.C. as Counsel to the Plaintiff filed by Lam Research Corp..Answering Brief/Response due date per Local Rules is 2/3/2023. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D)(Simon, Christopher) (Entered: 01/20/2023)
01/23/2023	14	MOTION to Dismiss for Failure to State a Claim - filed by Lam Research Corp.. (Attachments: # 1 Text of Proposed Order)(Gorman, John) (Entered: 01/23/2023)
01/23/2023	15	OPENING BRIEF in Support re 14 MOTION to Dismiss for Failure to State a Claim filed by Lam Research Corp..Answering Brief/Response due date per Local Rules is 2/6/2023. (Gorman, John) (Entered: 01/23/2023)
01/25/2023	16	CONSENT to Jurisdiction by U.S. Magistrate Judge filed by Inpria Corporation, Lam Research Corp. Case reassigned to Magistrate Judge Christopher J. Burke. Signed by Judge Colm F. Connolly on 1/25/2023. (nmf) (Entered: 01/25/2023)
01/25/2023		REMARK: The parties should be aware that the Court encourages the participation of newer attorneys in courtroom proceedings and at oral argument. Please see the Court's Standing Order Regarding Courtroom Opportunities for Newer Attorneys, a link to which is provided here for the parties' convenience: http://www.ded.uscourts.gov/sites/ded/files/forms/StandingOrder2017.pdf (dlb) (Entered: 01/25/2023)
01/25/2023		Remark: The parties should follow the Court's Standing Order Regarding Courtesy Copies, a copy of which is found on Judge Burke's portion of the District Court's webpage: https://www.ded.uscourts.gov/sites/ded/files/CJBCC2022.pdf (dlb) (dlb) Modified on 1/26/2023 (Rabian, Michael). (Entered: 01/25/2023)
01/25/2023	17	ORAL ORDER: The Court, having reviewed the docket and noting the pending Motion to Disqualify Counsel (Motion), (D.I. 12), hereby ORDERS that by no later than February 1, 2023, the parties shall submit a joint letter, of no more than three single-spaced pages, addressing the parties positions as to whether the Court should decide the Motion before taking any further action in this case (such as scheduling a Case Management Conference, or resolving the other pending motion to dismiss). Ordered by Judge Christopher J. Burke on 1/25/2023. (dlb) (Entered: 01/25/2023)
01/31/2023	18	STIPULATION TO EXTEND TIME for Inpria to File Its Opposition to Lam's Motion to Disqualify to February 10, 2023 - filed by Inpria Corporation. (Mabey, Warren) (Entered: 01/31/2023)
01/31/2023		SO ORDERED D.I. 18 STIPULATION TO EXTEND TIME for Inpria to File Its Opposition to Lam's Motion to Disqualify to February 10, 2023 filed by Inpria Corporation (Answering Brief due 2/10/2023.) Ordered by Judge Christopher J. Burke on 1/31/2023. (dlb) (Entered: 01/31/2023)
02/01/2023	19	Joint RESPONSE to Order re 17 Oral Order,, and Stipulation and [Proposed] Order to Extend Time. (Mabey, Warren) (Entered: 02/01/2023)
02/02/2023	20	ORAL ORDER: The Court, having reviewed the parties' February 1, 2023 letter, (D.I. 19), hereby ORDERS as follows: (1) The deadline for Plaintiff to file its opposition to Defendant's motion to dismiss, (D.I. 14), and/or to amend its Complaint are extended until 21 days after the resolution of the pending motion to disqualify, (D.I. 12); and (2) the Court will not enter a Scheduling Order or hold an initial Case Management Conference until after resolution of the motion to disqualify. Ordered by Judge Christopher J. Burke on 2/2/2023. (dlb) (Entered: 02/02/2023)
02/10/2023	21	ANSWERING BRIEF in Opposition re 12 MOTION to Disqualify Counsel //Motion to Disqualify Fish & Richardson P.C. as Counsel to the Plaintiff filed by Inpria Corporation.Reply Brief due date per Local Rules is 2/17/2023. (Mabey, Warren) (Entered: 02/10/2023)
02/10/2023	22	DECLARATION re 21 Answering Brief in Opposition, Declaration of Michael R. Headley by Inpria Corporation. (Mabey, Warren) (Entered: 02/10/2023)
02/10/2023	23	DECLARATION re 21 Answering Brief in Opposition, Declaration of Vickie Williams by Inpria Corporation. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D)(Mabey, Warren) (Entered: 02/10/2023)
02/13/2023	24	STIPULATION TO EXTEND TIME for Lam Research Corp. to file its reply in support of the Motion to Disqualify Fish & Richardson P.C. as Counsel to the Plaintiff to February 24, 2023 - filed by Lam Research Corp.. (Simon, Christopher) (Entered: 02/13/2023)
02/15/2023		SO ORDERED D.I. 24 STIPULATION TO EXTEND TIME for Lam Research Corp. to file its reply in support of the Motion to Disqualify Fish & Richardson P.C. as Counsel to the Plaintiff to February 24, 2023 filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 2/14/2023. (dlb) (Entered: 02/15/2023)
02/24/2023	25	REPLY BRIEF re 12 MOTION to Disqualify Counsel //Motion to Disqualify Fish & Richardson P.C. as Counsel to the Plaintiff filed by Lam Research Corp.. (Simon, Christopher) (Entered: 02/24/2023)
03/03/2023	26	REQUEST for Oral Argument by Inpria Corporation re 12 MOTION to Disqualify Counsel //Motion to Disqualify Fish & Richardson P.C. as Counsel to the Plaintiff. (Mabey, Warren) (Entered: 03/03/2023)
03/03/2023	27	REQUEST for Oral Argument by Lam Research Corp. re 12 MOTION to Disqualify Counsel //Motion to Disqualify Fish & Richardson P.C. as Counsel to the Plaintiff. (Simon, Christopher) (Entered: 03/03/2023)
10/12/2023	28	ORAL ORDER: Pending the Court's resolution of Defendant's Motion to Disqualify Counsel, (D.I. 12), the Court hereby ORDERS that Defendants Motion to Dismiss, (D.I. 14), is DENIED without prejudice to renew once the Court has resolved the Motion to Disqualify Counsel, (D.I. 20). Ordered by Judge Christopher J. Burke on 10/12/2023. (dlb) (Entered: 10/12/2023)
10/12/2023	29	ORAL ORDER: The Court hereby ORDERS that a videoconference to hear argument on Defendant's Motion to Disqualify Counsel ("Motion"), (D.I. 12), is set for November 27, 2023 at 1:00 p.m. before Judge Christopher J. Burke via the Microsoft Teams platform. By no later than November 17, 2023, the parties shall send an e-mail to the Court's Courtroom Deputy, Ms. Benyo, indicating the names and e-mail addresses of all individuals who will participate in the hearing. The Court may choose to resolve the Motion prior to the videoconference and will, in that event, cancel the videoconference (however, if any party advises the Court in advance that a newer attorney will argue the dispute, see Standing Order Regarding Courtroom Opportunities for Newer Attorneys, https://www.ded.uscourts.gov/sites/ded/files/StandingOrder2017.pdf , then the Court will go forward with the conference). Ordered by Judge Christopher J. Burke on 10/12/2023. (dlb) (Entered: 10/12/2023)
10/17/2023	30	Joint STIPULATION TO EXTEND TIME for Defendant to Move, Answer or Otherwise Respond to the Complaint to 14 Days After the Court Has Resolved the Motion to Disqualify - filed by Lam Research Corp.. (Gorman, John) (Entered: 10/17/2023)
10/17/2023		SO ORDERED D.I. 30 Joint STIPULATION TO EXTEND TIME for Defendant to Move, Answer or Otherwise Respond to the Complaint to 14 Days After the Court Has Resolved the Motion to Disqualify filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 10/17/2023. (dlb) (Entered: 10/17/2023)
11/17/2023	31	In light of a communication from the parties, the parties agree and the Court ORDERS that Defendant's motion to disqualify counsel, (D.I. 12), may be DENIED as MOOT, in light of the fact that Plaintiff will be substituting in new counsel. By no later than December 1, 2023, new counsel should enter their appearance for Plaintiff, or Plaintiff shall provide a status letter, of no more than two single-spaced pages, updating the Court as to when new counsel will enter an appearance. Ordered by Judge Christopher J. Burke on 11/17/2023. (dlb) (Entered: 11/17/2023)
11/29/2023	32	NOTICE of Appearance by Adam Wyatt Poff on behalf of Inpria Corporation (Poff, Adam) (Entered: 11/29/2023)
11/29/2023	33	NOTICE of Appearance by Robert M. Vrana on behalf of Inpria Corporation (Vrana, Robert) (Entered: 11/29/2023)
11/29/2023	34	MOTION for Pro Hac Vice Appearance of Attorney Paul M. Anderson, Eric W. Dittmann, Naveen Modi, Isaac S. Ashkenazi, and Phillip W. Citroen - filed by Inpria Corporation. (Poff, Adam) (Entered: 11/29/2023)
11/29/2023	35	Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Entry of Appearance on behalf of Plaintiff Inpria Corporation. (Poff, Adam) (Entered: 11/29/2023)
11/29/2023	36	ORAL ORDER: IT IS HEREBY ORDERED that the parties shall meet and confer and discuss, in person and/or by telephone, each of the matters listed on Judge Burke's Case Management Checklist ("Checklist"). Within fourteen (14) days from the date of this Order, the parties shall jointly file the following: (i) a copy of the Checklist, indicating the names of Lead Counsel and Delaware Counsel for each party; (ii) a proposed Scheduling Order, which is consistent with Judge Burkes "Rule 16 Scheduling Order - Patent"; and (iii) a letter, not to exceed three pages, that contains the following: (a) a description of what this case is about; (b) the parties' positions regarding any disputes in the proposed Scheduling Order, and (c) a list of the three most significant topics (other than Scheduling Order disputes) discussed during the parties review of the Checklist items, along with a brief description as to what was discussed as to those topics. Thereafter, the Court may schedule a Case Management Conference/Rule 16 Scheduling Conference to be held with Judge Burke. The Checklist and Scheduling Order can be found on Judge Burke's portion of the District Court's website. Ordered by Judge Christopher J. Burke on 11/29/2023. (dlb) (Entered: 11/29/2023)
12/01/2023	37	MOTION to Dismiss for Failure to State a Claim - filed by Lam Research Corp.. (Attachments: # 1 Text of Proposed Order)(Gorman, John) (Entered: 12/01/2023)

12/01/2023	38	OPENING BRIEF in Support re 37 MOTION to Dismiss for Failure to State a Claim filed by Lam Research Corp..Answering Brief/Response due date per Local Rules is 12/15/2023. (Gorman, John) (Entered: 12/01/2023)
12/01/2023	39	NOTICE of Withdrawal of Counsel by Inpria Corporation (Mabey, Warren) (Entered: 12/01/2023)
12/04/2023		SO ORDERED D.I. 34 MOTION for Pro Hac Vice Appearance of Attorney Paul M. Anderson, Eric W. Dittmann, Naveen Modi, Isaac S. Ashkenazi, and Phillip W. Citroen filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 12/4/2023. (dlb) (Entered: 12/04/2023)
12/11/2023	40	STIPULATION and [Proposed] Order Entering and Modifying Deadlines re 36 Oral Order,,,,, by Inpria Corporation. (Poff, Adam) (Entered: 12/11/2023)
12/12/2023		SO ORDERED D.I. 40 Stipulation filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 12/12/2023. (dlb) (Entered: 12/12/2023)
12/12/2023	41	MOTION for Pro Hac Vice Appearance of Attorney Michael J. Lyons - filed by Lam Research Corp.. (Attachments: # 1 Certification of Michael J. Lyons)(Gorman, John) (Entered: 12/12/2023)
12/12/2023	42	MOTION for Pro Hac Vice Appearance of Attorney Ahren C. Hsu-Hoffman - filed by Lam Research Corp.. (Attachments: # 1 Certification of Ahren C. Hsu-Hoffman)(Gorman, John) (Entered: 12/12/2023)
12/12/2023		Pro Hac Vice Attorney Eric W. Dittmann, Naveen Modi, Paul M. Anderson, Phillip W. Citroen, and Isaac S. Ashkenazi for Inpria Corporation added for electronic noticing. Pursuant to Local Rule 83.5 (d), Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (mpb) (Entered: 12/12/2023)
12/13/2023	43	AMENDED COMPLAINT against LAM RESEARCH CORP.- filed by Inpria Corporation. (Attachments: # 1 Exhibit A - L, # 2 Exhibit M - Y, # 3 Exhibit Z - HH, # 4 Exhibit II - RR)(Poff, Adam) Modified on 12/15/2023 (dlb). (Entered: 12/13/2023)
12/13/2023	44	Report to the Commissioner of Patents and Trademarks for Patent/Trademark Number(s) 10,642,153 ;11,537,048 ;11,673,903 ;11,693,312 ;11,809,081 . (Poff, Adam) (Entered: 12/13/2023)
12/19/2023	45	Joint Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Proposed Scheduling Order and Checklist - re 36 Oral Order,,,,,. (Attachments: # 1 Exhibit A)(Poff, Adam) (Entered: 12/19/2023)
12/19/2023	46	PROPOSED ORDER Scheduling Order re 45 Letter by Inpria Corporation. (Poff, Adam) (Entered: 12/19/2023)
12/20/2023	47	ORAL ORDER: The Court, having reviewed the parties' joint letter regarding a proposed scheduling order, (D.I. 45), and the parties proposed scheduling order, (D.I. 46), hereby ORDERS that a scheduling conference pursuant to Fed. R. Civ. P. 16 will be held utilizing the Microsoft Teams platform on January 8, 2024 at 10:00 a.m. before Judge Christopher J. Burke. By no later than December 29, 2023, the parties shall send an e-mail to the Court's Courtroom Deputy, Ms. Benyo, indicating the names and e-mail addresses of all individuals who will participate in the videoconference.. Ordered by Judge Christopher J. Burke on 12/20/2023. (dlb) (Entered: 12/20/2023)
12/20/2023	48	NOTICE OF SERVICE of Inpria Corporation's Identification of Asserted Patents, Accused Products, and Damages Model filed by Inpria Corporation.(Poff, Adam) (Entered: 12/20/2023)
01/03/2024	49	ORAL ORDER: At the request of the parties, the Court hereby ORDERS that the January 8, 2024 scheduling conference is RESCHEDULED for January 12, 2024 at 10:00 a.m. before Judge Christopher J. Burke via the Microsoft Teams platform. By no later than January 3, 2024, the parties shall send an e-mail to the Court's Courtroom Deputy, Ms. Benyo, indicating the names and e-mail addresses of all individuals who will participate in the videoconference. Ordered by Judge Christopher J. Burke on 1/3/2024. (dlb) Modified on 1/3/2024 (dlb). (Entered: 01/03/2024)
01/03/2024	50	MOTION for Pro Hac Vice Appearance of Attorney Katerina Hora Jacobson - filed by Lam Research Corp.. (Attachments: # 1 Certification of Katerina Hora Jacobson)(Gorman, John) (Entered: 01/03/2024)
01/03/2024	51	Pro Hac Vice Fee - Credit Card Payment received for Katerina Hora Jacobson. (re 50 MOTION for Pro Hac Vice Appearance of Attorney Katerina Hora Jacobson)(Payment of \$ 50, receipt number ADEDC-4305913).(Gorman, John) (Entered: 01/03/2024)
01/05/2024		SO ORDERED D.I. 50 MOTION for Pro Hac Vice Appearance of Attorney Katerina Hora Jacobson filed by Lam Research Corp., 42 MOTION for Pro Hac Vice Appearance of Attorney Ahren C. Hsu-Hoffman filed by Lam Research Corp., 41 MOTION for Pro Hac Vice Appearance of Attorney Michael J. Lyons filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 1/5/2024. (dlb) (Entered: 01/05/2024)
01/05/2024		Pro Hac Vice Attorneys Ahren Hsu-Hoffman, Katerina Hora Jacobson, and Michael J. Lyons for Lam Research Corp. added for electronic noticing. Pursuant to Local Rule 83.5 (d), Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (mpb) (Entered: 01/05/2024)
01/12/2024		Minute Entry for proceedings held before Judge Christopher J. Burke - Scheduling/Case Management Videoconference held on January 12, 2024. The Court provided certain dates to the parties and guidance on the parties' disputes. The Court ordered the parties to meet and confer and to submit a revised proposed scheduling order by no later than January 19, 2024.(Clerk: A. Herman) Appearances: I. Ashkenaki, P. Citroen, E. Dittmann, N. Modi and A. Poff for Plaintiff; A. Dudash, J. Gorman, A. Hsu-Hoffman, K. Hora Jacobson and M. Lyons for Defendant. (Court Reporter Kimberly Burnser) (dlb) (Entered: 01/12/2024)
01/12/2024	52	ANSWER to Complaint with Jury Demand <i>ANSWER TO AMENDED COMPLAINT, Defenses,</i> , COUNTERCLAIM against Lam Research Corp. by Lam Research Corp..(Gorman, John) (Entered: 01/12/2024)
01/12/2024	53	Disclosure Statement pursuant to Rule 7.1: No Parents or Affiliates Listed filed by Lam Research Corp.. (Gorman, John) (Entered: 01/12/2024)
01/18/2024	54	MOTION to Transfer Case to the Northern District of California Pursuant to 28 U.S. C. Section 1404(a) - filed by Lam Research Corp.. (Attachments: # 1 Text of Proposed Order)(Gorman, John) (Entered: 01/18/2024)
01/18/2024	55	OPENING BRIEF in Support re 54 MOTION to Transfer Case to the Northern District of California Pursuant to 28 U.S. C. Section 1404(a) filed by Lam Research Corp..Answering Brief/Response due date per Local Rules is 2/1/2024. (Gorman, John) (Entered: 01/18/2024)
01/18/2024	56	DECLARATION re 54 MOTION to Transfer Case to the Northern District of California Pursuant to 28 U.S. C. Section 1404(a), 55 Opening Brief in Support, <i>of Si Chen</i> by Lam Research Corp.. (Gorman, John) (Entered: 01/18/2024)
01/18/2024	57	DECLARATION re 54 MOTION to Transfer Case to the Northern District of California Pursuant to 28 U.S. C. Section 1404(a), 55 Opening Brief in Support, <i>OF MICHAEL J. LYONS</i> by Lam Research Corp.. (Attachments: # 1 Exhibit A - Stephen Meyers, LinkedIn, # 2 Exhibit B - Brian Cardineau, Principal Chemist, Inpria - LinkedIn m, # 3 Exhibit C - Joseph Edson, Inpria, LinkedIn, # 4 Exhibit D - Douglas Keszler, Distinguished Professor, Oregon State University, LinkedIn, # 5 Exhibit E - Alan Telecky, Director of Intellectual Property, Inpria, LinkedIn, # 6 Exhibit F - Kai Jiang, Inpria, LinkedIn, # 7 Exhibit G - Andrew Grenville, Inpria Corporation, LinkedIn, # 8 Exhibit H - Jason Stowers, Director of Product Integration, Inpria, LinkedIn, # 9 Exhibit I - Michael Kocsis, Vice President, Applications, Inpria, LinkedIn, # 10 Exhibit J - TJ Lamkin, Lead Engineer, Inpria, LinkedIn, # 11 Exhibit K - Truman Wambach, ASML, LinkedIn, # 12 Exhibit L - Weighted Caseload, # 13 Exhibit M - Plaintiff's ID of Asserted Patents, Accused Products, and Damages Model)(Gorman, John) (Entered: 01/18/2024)
01/19/2024	58	PROPOSED ORDER Scheduling Order by Inpria Corporation. (Poff, Adam) (Entered: 01/19/2024)
01/23/2024	59	SCHEDULING ORDER: Joinder of Parties due by 7/3/2024. Amended Pleadings due by 7/3/2024. Discovery due by 6/20/2025. Fact Discovery completed by 2/26/2025. Opening Expert Reports due by 3/26/2025. Rebuttal Expert Reports due by 5/5/2025. Reply Expert Reports due by 5/28/2025. Status Report due by 12/13/2024. Dispositive Motions due by 7/10/2025. A Motion Hearing is set for 9/3/2025 at 11:00 AM in Courtroom 2A before Judge Christopher J. Burke Claim Construction Opening Brief due by 8/15/2024. Claim Construction Answering Brief due by 9/12/2024. Claim Construction Reply Brief due by 9/25/2024. Claim Construction Surreply Brief due by 10/8/2024. A Markman Hearing is set for 11/6/2024 at 11:00 AM in Courtroom 2A before Judge Christopher J. Burke. A Pretrial Conference is set for 12/5/2025 at 10:00 AM in Courtroom 2A before Judge Christopher J. Burke. A Jury Trial is set for 12/15/2025 at 09:00 AM in Courtroom 2A before Judge Christopher J. Burke. Please see order for further details and deadlines. Signed by Judge Christopher J. Burke on 1/23/2024. (dlb) (Entered: 01/23/2024)
01/23/2024	60	NOTICE OF SERVICE of 1) Inpria's First Set of Interrogatories (Nos. 1- 3); and 2) Inpria's First Requests for Production to Lam (Nos. 1- 27) filed by Inpria Corporation.(Poff, Adam) (Entered: 01/23/2024)
01/23/2024		Set Hearings: A Dispositive Motion Hearing is set for 9/3/2025 at 11:00 AM in Courtroom 2A before Judge Christopher J. Burke per D.I. 59 . (smg) (Entered: 09/27/2024)
02/01/2024	61	ANSWERING BRIEF in Opposition re 54 MOTION to Transfer Case to the Northern District of California Pursuant to 28 U.S. C. Section 1404(a) filed by Inpria Corporation.Reply Brief due date per Local Rules is 2/8/2024. (Attachments: # 1 Text of Proposed Order)(Vrana, Robert) (Main Document 61 replaced on 2/2/2024) (dlb). (Entered: 02/01/2024)
02/01/2024	62	DECLARATION re 61 Answering Brief in Opposition, <i>of Phillip W. Citroen</i> by Inpria Corporation. (Attachments: # 1 Exhibit 1 - 9)(Vrana, Robert) (Main Document 62 replaced on 2/2/2024) (dlb). (Entered: 02/01/2024)
02/02/2024		CORRECTING ENTRY: PDF at D.I. 61 and 62 have been replaced at the request of the filer to correct a typo. (dlb) (Entered: 02/02/2024)
02/02/2024	63	ANSWER to Complaint with Jury Demand <i>Plaintiff Inpria Corp.'s Responses To Defendant Lam Research Corp.'s Counterclaims</i> by Inpria Corporation.(Vrana, Robert) (Entered: 02/02/2024)
02/02/2024	64	NOTICE OF SERVICE of Lam Research Corp.'s Rule 26 Disclosures filed by Lam Research Corp..(Gorman, John) (Entered: 02/02/2024)
02/05/2024	65	NOTICE OF SERVICE of Inpria Corporation's Initial Disclosures Pursuant to Fed. R. Civ. P. 26. filed by Inpria Corporation.(Vrana, Robert) (Entered: 02/05/2024)
02/06/2024	66	MOTION to Stay <i>Pending Resolution of the Research Foundation for the State University of New York v. Inpria Corp. and JSR Corp., C.A. No. 1:24-cv-00120-MAD-ML (N.D.N.Y.)</i> - filed by Lam Research Corp.. (Attachments: # 1 Text of Proposed Order)(Gorman, John) (Entered: 02/06/2024)
02/06/2024	67	Letter to The Honorable Christopher Burke from John V. Gorman regarding Letter Brief in Support of its Motion to Stay - re 66 MOTION to Stay <i>Pending Resolution of the Research Foundation for the State University of New York v. Inpria Corp. and JSR Corp., C.A. No. 1:24-cv-00120-MAD-ML (N.D.N.Y.)</i> . (Attachments: # 1 Exhibit A, # 2 Exhibit B)(Gorman, John) (Entered: 02/06/2024)
02/08/2024	68	REPLY BRIEF re 54 MOTION to Transfer Case to the Northern District of California Pursuant to 28 U.S. C. Section 1404(a) filed by Lam Research Corp.. (Gorman, John) (Entered: 02/08/2024)
02/08/2024	69	DECLARATION re 68 Reply Brief of <i>Si Chen</i> in Support of Defendant Lam Research Corp.'s Reply Brief in Support of its Motion to Transfer to the Northern District of California by Lam Research Corp.. (Gorman, John) (Entered: 02/08/2024)
02/08/2024	70	MOTION for Pro Hac Vice Appearance of Attorney Chetan R. Bansal - filed by Inpria Corporation. (Vrana, Robert) (Entered: 02/08/2024)
02/08/2024	71	Pro Hac Vice Fee - Credit Card Payment received for Chetan R. Bansal. (re 70 MOTION for Pro Hac Vice Appearance of Attorney Chetan R. Bansal)(Payment of \$ 50, receipt number ADEDC-4334172).(Vrana, Robert) (Entered: 02/08/2024)

02/09/2024		SO ORDERED D.I. 70 MOTION for Pro Hac Vice Appearance of Attorney Chetan R. Bansal filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 2/9/24. (dlb) (Entered: 02/09/2024)
02/09/2024	72	ORAL ORDER: The Court hereby ORDERS that a videoconference to hear argument on Defendant's Motion to Transfer Venue ("Motion"), (D.I. 54), is set for April 8, 2024 at 2:30 p.m. before Judge Christopher J. Burke via the Microsoft Teams platform. By no later than March 29, 2024, the parties shall send an e-mail to the Court's Courtroom Deputy, Ms. Benyo, indicating the names and e-mail addresses of all individuals who will participate in the hearing. The Court may choose to resolve the Motion prior to the videoconference and will, in that event, cancel the videoconference (however, if any party advises the Court in advance that a newer attorney will argue the dispute, see Standing Order Regarding Courtroom Opportunities for Newer Attorneys, https://www.ded.uscourts.gov/sites/ded/files/StandingOrder2017.pdf , then the Court will go forward with the conference). Signed by Judge Christopher J. Burke on 2/9/2024. (dlb) (Entered: 02/09/2024)
02/09/2024		Pro Hac Vice Attorney Chetan R. Bansal for Inpria Corporation added for electronic noticing. Pursuant to Local Rule 83.5 (d), Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (mpb) (Entered: 02/09/2024)
02/13/2024	73	STIPULATION and [Proposed] Order Modifying Deadlines by Inpria Corporation. (Vrana, Robert) (Entered: 02/13/2024)
02/13/2024	74	NOTICE OF SERVICE of Lam Research Corp.'s First Set of Requests for Production to Impria (Nos. 1-52) filed by Lam Research Corp..(Gorman, John) (Entered: 02/13/2024)
02/13/2024	75	NOTICE OF SERVICE of Lam Research Corp.'s First Set of Interrogatories to Inpria (Nos. 1-7) filed by Lam Research Corp..(Gorman, John) (Entered: 02/13/2024)
02/15/2024		SO ORDERED D.I. 73 Stipulation Modifying Deadlines filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 2/15/2024. (dlb) (Entered: 02/15/2024)
02/20/2024	76	NOTICE OF SERVICE of Lam Research Corp.'s Initial ESI Disclosures Pursuant to Paragraph 3 of the Court's Default Standard for Discovery filed by Lam Research Corp..(Gorman, John) (Entered: 02/20/2024)
02/20/2024	77	[SEALED] Letter to The Honorable Christopher J. Burke from Robert M. Vrana regarding Opposition to Lam's Motion to Stay - re 66 MOTION to Stay <i>Pending Resolution of the Research Foundation for the State University of New York v. Inpria Corp. and JSR Corp., C.A. No. 1:24-cv-00120-MAD-ML (N.D.N.Y.)</i> . (Vrana, Robert) (Entered: 02/20/2024)
02/20/2024	78	[SEALED] DECLARATION re 77 Letter, of Mark Thorpe by Inpria Corporation. (Vrana, Robert) (Entered: 02/20/2024)
02/20/2024	79	DECLARATION re 77 Letter, of Phillip W. Citroen by Inpria Corporation. (Attachments: # 1 Exhibit 1 - 4)(Vrana, Robert) (Entered: 02/20/2024)
02/20/2024	80	NOTICE OF SERVICE of Inpria Corporation's Initial Disclosures Pursuant to Paragraph 3 of the Default Standard for Discovery filed by Inpria Corporation.(Vrana, Robert) (Entered: 02/20/2024)
02/21/2024	81	STIPULATION TO EXTEND TIME for the parties to file a proposed protective order to February 29, 2024 - filed by Inpria Corporation. (Vrana, Robert) (Entered: 02/21/2024)
02/21/2024	82	NOTICE OF SERVICE of Lam Research Corp.'s Responses and Objections to Inpria's First Set of Interrogatories (Nos. 1-3) re 60 Notice of Service filed by Lam Research Corp..(Gorman, John) (Entered: 02/21/2024)
02/21/2024	83	NOTICE OF SERVICE of Lam Research Corp.'s Responses and Objections to Inpria's First Set of Requests for Production of Documents and Things (Nos. 1-27) re 60 Notice of Service filed by Lam Research Corp..(Gorman, John) (Entered: 02/21/2024)
02/22/2024		SO ORDERED D.I. 81 STIPULATION TO EXTEND TIME for the parties to file a proposed protective order to February 29, 2024 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 2/22/2024. (dlb) (Entered: 02/22/2024)
02/23/2024	84	NOTICE OF SERVICE of Verification of Lam Research Corp.'s Responses and Objections to Impria's First Set of Interrogatories (Nos. 1-3) filed by Lam Research Corp..(Gorman, John) (Entered: 02/23/2024)
02/23/2024	85	[SEALED] Letter to The Honorable Christopher J. Burke from John V. Gorman regarding Reply Letter Brief in Support of its Motion to Stay with Certificate of Service - re 67 Letter,. (Gorman, John) (Entered: 02/23/2024)
02/23/2024	86	Letter to The Honorable Christopher J. Burke from John V. Gorman regarding requesting oral argument on Defendant's Motion to Stay - re 67 Letter, 72 Order Setting Hearing on Motion,,, Order Setting Videoconference,,, (Gorman, John) (Entered: 02/23/2024)
02/26/2024	87	NOTICE OF SERVICE of Lam Research Corp. Corrected Responses and Objections to Inpria Corporation's Interrogatory Nos. 1-3 re 82 Notice of Service filed by Lam Research Corp..(Gorman, John) (Entered: 02/26/2024)
02/26/2024	88	ORAL ORDER: The Court hereby ORDERS that a videoconference to hear argument on Defendant's Motion to Stay ("Motion"), (D.I. 66), is set for April 22, 2024 at 10:00 a.m. before Judge Christopher J. Burke via the Microsoft Teams platform. By no later than April 12, 2024, the parties shall send an e-mail to the Court's Courtroom Deputy, Ms. Benyo, indicating the names and e-mail addresses of all individuals who will participate in the hearing. The Court may choose to resolve the Motion prior to the videoconference and will, in that event, cancel the videoconference (however, if any party advises the Court in advance that a newer attorney will argue the dispute, see Standing Order Regarding Courtroom Opportunities for Newer Attorneys, https://www.ded.uscourts.gov/sites/ded/files/StandingOrder2017.pdf , then the Court will go forward with the conference). Ordered by Judge Christopher J. Burke on 2/26/2024. (dlb) Modified on 2/27/2024 (dlb). (Entered: 02/26/2024)
02/27/2024	89	STIPULATION and [Proposed] Order Modifying Deadlines re 85 Letter, 77 Letter, by Inpria Corporation. (Vrana, Robert) (Entered: 02/27/2024)
02/28/2024		SO ORDERED D.I. 89 Stipulation modifying redaction deadlines filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 2/28/2024. (dlb) (Entered: 02/28/2024)
02/29/2024	90	STIPULATION TO EXTEND TIME for the parties to file a proposed protective order to March 7, 2024 - filed by Inpria Corporation. (Poff, Adam) (Entered: 02/29/2024)
02/29/2024		SO ORDERED D.I. 90 STIPULATION TO EXTEND TIME for the parties to file a proposed protective order to March 7, 2024 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 2/29/2024. (dlb) (Entered: 02/29/2024)
03/05/2024	91	STIPULATION and [Proposed] Order Modifying Deadlines re 85 Letter, 77 Letter, by Inpria Corporation. (Vrana, Robert) (Entered: 03/05/2024)
03/06/2024		SO ORDERED D.I. 91 Stipulation extending dates to file redactions filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 3/6/2024. (dlb) (Entered: 03/06/2024)
03/07/2024	92	PROPOSED ORDER Protective Order Governing the Designation and Handling of Confidential Materials by Inpria Corporation. (Poff, Adam) (Entered: 03/07/2024)
03/08/2024	93	REDACTED VERSION of 77 Letter, by Inpria Corporation. (Vrana, Robert) (Entered: 03/08/2024)
03/08/2024	94	REDACTED VERSION of 78 Declaration by Inpria Corporation. (Vrana, Robert) (Entered: 03/08/2024)
03/08/2024	95	PROTECTIVE ORDER. Signed by Judge Christopher J. Burke on 3/8/2024. (dlb) (Entered: 03/08/2024)
03/13/2024	96	REDACTED VERSION of 85 Letter <i>Reply Brief in Support of its Motion to Stay</i> by Lam Research Corp.. (Gorman, John) (Entered: 03/13/2024)
03/22/2024	97	NOTICE OF SERVICE of 1) Plaintiff's Objections and Responses to Defendant's First Set of Requests for Production (Nos. 1-52); and 2) Plaintiff's Objections and Responses to Defendant's First Set of Interrogatories (Nos. 1-7), filed by Inpria Corporation.(Poff, Adam) (Entered: 03/22/2024)
03/28/2024	98	STIPULATION and [Proposed] Order Modifying Deadlines by Inpria Corporation. (Poff, Adam) (Entered: 03/28/2024)
03/28/2024		SO ORDERED D.I. 98 Stipulation modifying deadlines filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 3/28/2024. (mlc) (Entered: 03/28/2024)
04/02/2024	99	NOTICE OF SERVICE of Inpria Corporation's Initial Infringement Contentions filed by Inpria Corporation.(Vrana, Robert) (Entered: 04/02/2024)
04/08/2024		Minute Entry for proceedings held before Judge Christopher J. Burke - Hearing on Defendants Motion to Transfer held on April 8, 2024. The Court heard the parties' arguments on Defendant's Motion to Transfer. (D.I. 54) The Court denied the motion. The substance of the Court's order will be reflected in the transcript. (Clerk: A. Herman) Appearances: N. Modi, B. Wilner, M. Moss, A. Poff and D. Mackrides for Plaintiff; J. Gorman, M. Lyons, A. Hsu-Hoffman and K. Hora Jacobson for Defendant. (Court Reporter Deanna Warner) (dlb) (Entered: 04/08/2024)
04/18/2024	100	NOTICE OF SERVICE of Subpoena to Produce Documents, Electronically Stored Information, and Things to Intel Corporation and Intel Capital filed by Lam Research Corp..(Simon, Christopher) (Entered: 04/18/2024)
04/18/2024	101	SUBPOENA Returned Executed as to Intel Corporation on 4/17/2024 (Simon, Christopher) (Entered: 04/18/2024)
04/18/2024	102	SUBPOENA Returned Executed as to Intel Capital on 4/17/2024 (Simon, Christopher) (Entered: 04/18/2024)
04/18/2024	103	NOTICE OF SERVICE of Plaintiff's Supplemental Objections and Responses to Defendant's First Set of Interrogatories (Nos. 1 - 7) filed by Inpria Corporation.(Vrana, Robert) (Entered: 04/18/2024)
04/19/2024	104	Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding pro hac vice admission of Brooke M. Wilner, Esq.. (Poff, Adam) (Entered: 04/19/2024)
04/19/2024	105	MOTION for Pro Hac Vice Appearance of Attorney Brooke M. Wilner - filed by Inpria Corporation. (Poff, Adam) (Entered: 04/19/2024)
04/19/2024	106	Pro Hac Vice Fee - Credit Card Payment received for Brooke M. Wilner. (re 105 MOTION for Pro Hac Vice Appearance of Attorney Brooke M. Wilner) (Payment of \$ 50, receipt number ADEDC-4388606).(Poff, Adam) (Entered: 04/19/2024)
04/19/2024		SO ORDERED D.I. 105 MOTION for Pro Hac Vice Appearance of Attorney Brooke M. Wilner filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 4/19/2024. (dlb) (Entered: 04/19/2024)
04/19/2024		Pro Hac Vice Attorney Brooke M. Wilner for Inpria Corporation added for electronic noticing. Pursuant to Local Rule 83.5 (d), Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (oam) (Entered: 04/19/2024)
04/22/2024	107	ORAL ORDER: The Court advises the parties that on today's videoconference, it would be helpful if they were prepared to discuss the apparent disconnect between Plaintiff's assertion that the parties are "direct competitors," (D.I. 77 at 4), and Defendant's assertion that they are not, (D.I. 85 at 2). Ordered by Judge Christopher J. Burke on 04/22/2024. (smg) (Entered: 04/22/2024)
04/22/2024		Minute Entry for proceedings held before Judge Christopher J. Burke - Hearing on Defendant's Motion to Stay held on April 22, 2024. The Court heard the parties' arguments regarding Defendant's Motion to Stay. (D.I. 66) The Court took the matter under advisement. (Clerk: A. Herman; Court Reporter: Deanna Warner) Appearances: N. Modi, E. Dittman, B. Wilner, M. Moss, A. Poff and D. Mackrides for Plaintiff; J. Gorman, A. Dudash, M. Lyons, A. Hsu-Hoffman and K. Hora Jacobson for Defendant. (smg) (Entered: 04/22/2024)

04/22/2024	108	ORAL ORDER: By no later than close of business on April 23, 2024, Plaintiff may submit a letter of no more than one (1) single-spaced page, in no less than 12-point font, that attaches the documents it was referencing on today's videoconference regarding the competitor issue and explains why they believe they are relevant to Defendant's pending Motion to Stay. (D.I. 66) By no later than close of business on April 25, 2024, Defendant may respond to Plaintiff's letter in a letter of no more than one (1) single-spaced page, in no less than 12-point font. Ordered by Judge Christopher J. Burke on 04/22/2024. (smg) (Entered: 04/22/2024)
04/23/2024	109	[SEALED] Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Plaintiff's Submission in Support of its Opposition to Motion to Stay - re 108 Oral Order,. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C)(Poff, Adam) (Entered: 04/23/2024)
04/24/2024	110	NOTICE OF SERVICE of Lam Research Corp.'s Supplemental Responses and Objections to Inpria's First Set of Interrogatories (Nos. 1-3) filed by Lam Research Corp..(Gorman, John) (Entered: 04/24/2024)
04/25/2024	111	Letter to The Honorable Christopher J. Burke from John V. Gorman regarding enclosing Decision of the Patent Trial and Appeal Board of the United States Patent and Trademark Office. (Attachments: # 1 Patent Trial and Appeal Board of the United States Patent and Trademark Office Decision)(Gorman, John) (Entered: 04/25/2024)
04/25/2024	112	Letter to The Honorable Christopher J. Burke from John V. Gorman regarding Responsive Letter Brief to Plaintiff's Letter Brief - re 108 Oral Order,. (Gorman, John) (Entered: 04/25/2024)
04/29/2024	113	SUBPOENA Returned Executed as to Samsung Electronics America, Inc. on 4/29/2024 (Simon, Christopher) (Entered: 04/29/2024)
04/29/2024	114	NOTICE OF SERVICE of Subpoena to Produce Documents, Electronically Stored Information, and Things to Samsung Electronics America, Inc. filed by Lam Research Corp..(Simon, Christopher) (Entered: 04/29/2024)
05/01/2024		REDACTION NOTICE: In accordance with section G of the Administrative Procedures Governing Filing and Service by Electronic Means, redacted versions of sealed documents shall be filed electronically within 7 days of the filing of the sealed document. The records of this case do not reflect the filing of a redacted version of DI # 109 SEALED Letter. (smg) (Entered: 05/01/2024)
05/01/2024	115	REDACTED VERSION of 109 Letter, by Inpria Corporation. (Poff, Adam) (Entered: 05/01/2024)
05/03/2024	116	MEMORANDUM ORDER: Any such redacted version shall be submitted no later than May 8, 2024 for review by the Court. Signed by Judge Christopher J. Burke on 05/03/2024.This order has been emailed to local counsel. (smg) UNSEALED on 5/9/2024, deadline to redact has passed. (smg). (Entered: 05/03/2024)
05/09/2024		Remark: D.I. 116 Memorandum Order has been UNSEALED. Deadline to request redactions has passed. (smg) (Entered: 05/09/2024)
05/14/2024	117	NOTICE OF SERVICE of Defendant's Initial Invalidity Contentions filed by Lam Research Corp..(Gorman, John) (Entered: 05/14/2024)
05/17/2024	118	Letter to The Honorable Christopher J. Burke from John V. Gorman regarding request scheduling of a discovery teleconference. (Gorman, John) (Entered: 05/17/2024)
05/20/2024	119	NOTICE OF SERVICE of Lam Research Corp.'s Second Set of Requests for Production to Inpria (Nos. 53-56) filed by Lam Research Corp..(Gorman, John) (Entered: 05/20/2024)
05/22/2024	120	ORAL ORDER: The Court has reviewed the parties' joint letter requesting a discovery dispute videoconference. (D.I. 118) There are eight separate disputes listed, which is a lot for an individual letter like this. The Court wants to ensure that the parties have really made a strong effort to meet and confer and attempt to resolve those disputes that can be resolved and the sheer number of issues listed in this letter causes the Court to worry that this may not have happened. Plus, if the parties can get the number of disputes reduced a bit, that may make it easier for the Court to fit in a videoconference on its schedule sooner rather than later to address all disputes (i.e., if there really are eight disputes, the Court may need to break them up into different hearings on different weeks). In light of this, the Court hereby ORDERS that counsel (including at least one Delaware counsel per side, and the most senior attorney per side who has familiarity with the disputes) participate in one further verbal meet and confer in order to discuss whether any of these issues can be resolved or tabled for now. By no later than May 29, 2024, the parties shall file a letter of no more than two single-spaced pages, indicating whether they have been able to resolve or table any of the eight listed disputes, and which disputes remain to be resolved by the Court. Ordered by Judge Christopher J. Burke on 05/22/2024. (smg) Modified on 5/22/2024 (smg). (Entered: 05/22/2024)
05/24/2024	121	NOTICE OF SERVICE of 1) Inpria's Second Set of Interrogatories to Lam (Nos. 413); and 2) Inpria's Second Set of Requests for Production of Documents and Things to Lam (Nos. 28-49) filed by Inpria Corporation.(Vrana, Robert) (Entered: 05/24/2024)
05/29/2024	122	Joint STIPULATION TO EXTEND TIME for Parties to File Letter in Response to the Court's May 22, 2024 Oral Order (D.I. 120) to May 30, 2024 - filed by Lam Research Corp.. (Gorman, John) (Entered: 05/29/2024)
05/29/2024		SO ORDERED, D.I. 122 Joint STIPULATION TO EXTEND TIME for Parties to File Letter in Response to the Court's May 22, 2024 Oral Order (D.I. 120) to May 30, 2024 filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 05/30/2024. (smg) (Entered: 05/30/2024)
05/30/2024	123	Letter to The Honorable Christopher J. Burke from John V. Gorman regarding responding to the Court's May 22, 2024 Oral Order - re 120 Oral Order. (Gorman, John) Modified on 5/31/2024 (smg). (Entered: 05/30/2024)
05/31/2024		CORRECTING ENTRY: Previous Letter has been deleted per request of counsel for lack of signature. Letter was refiled and has been renumbered as D.I. 123 . (smg) (Entered: 05/31/2024)
05/31/2024	124	ORAL ORDER: The Court, has reviewed the parties' May 30, 2024 letter, (D.I. 123), and appreciates the parties' efforts to reduce the number of disputed issues that the Court needs to resolve now; the Court hereby ORDERS as follows: (1) A discovery dispute videoconference using the Microsoft Teams platform is set for August 5, 2024 at 3:00 p.m. before Judge Christopher J. Burke.; (2) By June 7, 2024, Defendant shall file a "Motion for Videoconference to Resolve Discovery Dispute," the text of which can be found in the "Forms" tab on Judge Burke's portion of the District Court's website; (3) By June 7, 2024, Defendant shall file with the Court a letter, not to exceed three (3) single-spaced pages, in no less than 12-point font, outlining the issues in dispute and their position on those issues. By June 14, 2024, Plaintiff shall file with the Court a letter, not to exceed three (3) single-spaced pages, in no less than 12-point font, outlining the reasons for their opposition. By no later than June 21, 2024, Defendant shall file with the Court a reply letter brief, not to exceed one (1) single-spaced page, in no less than 12-point font.; (4) By no later than July 26, 2024, the parties shall send an e-mail to the Court's Courtroom Deputy, Ms. Grimes, indicating the names and e-mail addresses of all individuals who will participate in the videoconference.; (5) The parties should also consult and follow Judge Burke's "Guidelines for Discovery Disputes," which is found in the "Guidelines" tab on Judge Burke's portion of the District Court's website.; and (6) The Court may choose to resolve the dispute prior to the videoconference and will, in that event, cancel the videoconference (however, if any party advises the Court in advance that a newer attorney will argue the dispute, see Standing Order Regarding Courtroom Opportunities for Newer Attorneys, https://www.ded.uscourts.gov/sites/ded/files/StandingOrder2017.pdf , then the Court will go forward with the conference). Ordered by Judge Christopher J. Burke on 05/31/2024. (smg) (Entered: 05/31/2024)
06/03/2024		NOTICE: Per Magistrate Judge Burke's Standing Order Regarding Courtesy Copies, which requires two (2) courtesy copies of all briefs (including letter briefs), as well as any documents filed in support of such briefs (i.e., appendices, exhibits, declarations, affidavits, tutorials, etc.) and one (1) copy of any other document filed (e.g., letters and stipulations), please submit to the Clerk's Office a copy of D.I. # 123 . (smg) (Entered: 06/03/2024)
06/04/2024	125	MOTION for Pro Hac Vice Appearance of Attorney Young J. Park, Joseph E. Palys, Richard Rothman, Douglas W. Check, Seal Ortega-Rodriguez, and Madeleine Moss - filed by Inpria Corporation. (Vrana, Robert) (Entered: 06/04/2024)
06/04/2024	126	Pro Hac Vice Fee - Credit Card Payment received for Young J. Park, Joseph E. Palys, Richard Rothman, Douglas W. Check, and Seal Ortega-Rodriguez. (re 125 MOTION for Pro Hac Vice Appearance of Attorney Young J. Park, Joseph E. Palys, Richard Rothman, Douglas W. Check, Seal Ortega-Rodriguez, and Madeleine Moss)(Payment of \$ 250, receipt number ADEDC-4422396).(Vrana, Robert) (Entered: 06/04/2024)
06/04/2024	127	Pro Hac Vice Fee - Credit Card Payment received for Madeleine Moss. (re 125 MOTION for Pro Hac Vice Appearance of Attorney Young J. Park, Joseph E. Palys, Richard Rothman, Douglas W. Check, Seal Ortega-Rodriguez, and Madeleine Moss)(Payment of \$ 50, receipt number ADEDC-4422401).(Vrana, Robert) (Entered: 06/04/2024)
06/04/2024		SO ORDERED, D.I. 125 MOTION for Pro Hac Vice Appearance of Attorney Young J. Park, Joseph E. Palys, Richard Rothman, Douglas W. Check, Seal Ortega-Rodriguez, and Madeleine Moss filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 06/04/2024. (smg) (Entered: 06/04/2024)
06/06/2024		Pro Hac Vice Attorney Madeleine Moss for Inpria Corporation added for electronic noticing. Pursuant to Local Rule 83.5 (d), Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (oam) (Entered: 06/06/2024)
06/06/2024		Pro Hac Vice Attorney Douglas W. Check for Inpria Corporation added for electronic noticing. Pursuant to Local Rule 83.5 (d), Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (oam) (Entered: 06/06/2024)
06/06/2024		Pro Hac Vice Attorney Joseph E. Palys for Inpria Corporation added for electronic noticing. Pursuant to Local Rule 83.5 (d), Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (oam) (Entered: 06/06/2024)
06/06/2024		Pro Hac Vice Attorney Seal Ortega-Rodriguez for Inpria Corporation added for electronic noticing. Pursuant to Local Rule 83.5 (d), Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (oam) (Entered: 06/06/2024)
06/06/2024		Pro Hac Vice Attorney Richard Rothman for Inpria Corporation added for electronic noticing. Pursuant to Local Rule 83.5 (d), Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (oam) (Entered: 06/06/2024)
06/06/2024		Pro Hac Vice Attorney Young J. Park for Inpria Corporation added for electronic noticing. Pursuant to Local Rule 83.5 (d), Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (oam) (Entered: 06/06/2024)
06/07/2024	128	MOTION for Teleconference to Resolve Discovery Dispute re 124 Oral Order. - filed by Lam Research Corp. (Gorman, John) Modified on 6/10/2024 (smg). (Entered: 06/07/2024)
06/07/2024	129	Letter to The Honorable Christopher Burke from John V. Gorman regarding Letter Brief in Support of its Motion to Compel Inpria's Supplemental Responses to Interrogatory Nos. 3 and 7. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G)(Gorman, John) (Entered: 06/07/2024)
06/14/2024	130	Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding opposition to Defendant's Motion to Compel - re 129 Letter,. (Poff, Adam) (Entered: 06/14/2024)
06/17/2024	131	NOTICE OF SERVICE of Plaintiff's Objections and Responses to Defendant's Second Set of Requests for Production (Nos. 53 - 56) filed by Inpria Corporation.(Vrana, Robert) (Entered: 06/17/2024)
06/20/2024	132	NOTICE OF SERVICE of Plaintiff's Initial Claim Construction Chart filed by Inpria Corporation.(Vrana, Robert) (Entered: 06/20/2024)
06/20/2024	133	NOTICE OF SERVICE of Lam Research Corp.'s Claim Construction Issue Identification filed by Lam Research Corp..(Gorman, John) (Entered: 06/20/2024)
06/21/2024	134	Letter to The Honorable Christopher J. Burke from John V. Gorman regarding reply letter brief in support of its Motion to Compel Inpria's Supplemental Responses to Interrogatory Nos. 3 and 7 - re 129 Letter, 130 Letter. (Gorman, John) (Entered: 06/21/2024)

06/27/2024	135	NOTICE OF SERVICE of Lam Research Corp.'s Responses and Objections to Inpria's Second Set of Interrogatories (Nos. 4-13) and Lam Research Corp's Responses and Objections to Inpria's Second Set of Requests for Production (Nos. 28-49) filed by Lam Research Corp..(Gorman, John) (Entered: 06/27/2024)
06/27/2024	136	STIPULATION TO EXTEND TIME for the parties to submit motions to join other parties, and to amend or supplement the pleadings to July 24, 2024 - filed by Inpria Corporation. (Poff, Adam) (Entered: 06/27/2024)
06/27/2024		SO ORDERED, D.I. 136 STIPULATION TO EXTEND TIME for the parties to submit motions to join other parties, and to amend or supplement the pleadings to July 24, 2024 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 06/27/2024. (smg) (Entered: 06/27/2024)
07/08/2024	137	NOTICE OF SERVICE of Lam Research Corp.'s Responsive Proposed Claim Terms with Proposed Constructions filed by Lam Research Corp..(Gorman, John) (Entered: 07/08/2024)
07/15/2024	138	NOTICE OF SERVICE of Inpria Corporations Third Set of Interrogatories to Lam (Nos. 14-16). filed by Inpria Corporation.(Vrana, Robert) (Entered: 07/15/2024)
07/18/2024	139	MOTION for Pro Hac Vice Appearance of Attorney Phillip D. Wolfe and Alison P. Patitucci - filed by Lam Research Corp.. (Attachments: # 1 Certification of Phillip D. Wolfe, # 2 Certification of Alison P. Patitucci)(Gorman, John) (Entered: 07/18/2024)
07/18/2024	140	Pro Hac Vice Fee - Credit Card Payment received for Phillip D. Wolfe and Alison P. Patitucci. (re 139 MOTION for Pro Hac Vice Appearance of Attorney Phillip D. Wolfe and Alison P. Patitucci) (Payment of \$ 100, receipt number ADEDC-4454102),(Gorman, John) (Entered: 07/18/2024)
07/18/2024		SO ORDERED, D.I. 139 MOTION for Pro Hac Vice Appearance of Attorney Phillip D. Wolfe and Alison P. Patitucci filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 07/18/2024. (smg) (Entered: 07/18/2024)
07/18/2024		Pro Hac Vice Attorney Alison P. Patitucci, Phillip D. Wolfe for Lam Research Corp. added for electronic noticing. Pursuant to Local Rule 83.5 (d), Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (mvs) (Entered: 07/18/2024)
07/19/2024	141	CLAIM Construction Chart by Inpria Corporation. (Attachments: # 1 Exhibit A, # 2 Exhibit A1 - A20, # 3 Exhibit A21 - A40, # 4 Exhibit A41 - A60, # 5 Exhibit A61 - A77, # 6 Exhibit A78 - A84)(Poff, Adam) (Entered: 07/19/2024)
07/22/2024	142	ORAL ORDER: The Court, having reviewed the parties' Joint Claim Construction Chart, (D.I. 141 , ex. A), hereby orders as follows: (1) The Court will accept claim construction briefing on no more than 10 terms.; (2) At the Markman hearing, the Court will hear argument on no more than six terms.; and (3) For any terms wherein a party asserts that the construction of the term is "ordinary and customary meaning," in its claim construction briefing, the party shall clearly articulate what it contends is the "ordinary and customary meaning" of each such term. Ordered by Judge Christopher J. Burke on 07/22/2024. (smg) (Entered: 07/23/2024)
07/23/2024	143	STIPULATION and [Proposed] Order Modifying Deadlines by Lam Research Corp.. (Gorman, John) (Entered: 07/23/2024)
07/23/2024		SO ORDERED, D.I. 143 Stipulation filed by Lam Research Corp. (Amended Pleadings due by 8/7/2024., Joinder of Parties due by 8/7/2024.) Ordered by Judge Christopher J. Burke on 7/23/2024. (smg) (Entered: 07/23/2024)
08/02/2024	144	ORAL ORDER: The Court, having reviewed the briefing regarding Defendant's pending discovery dispute motion ("Motion"), (D.I. 128), hereby ORDERS that it will resolve the Motion on the papers and that Monday's videoconference is hereby CANCELED. Ordered by Judge Christopher J. Burke on 8/2/2024. (smg) (Entered: 08/02/2024)
08/05/2024	145	ORAL ORDER: The Court, having reviewed Defendant's pending discovery dispute motion ("Motion"), (D.I. 128), and the briefing related thereto, (D.I. 129 ; D.I. 130 ; D.I. 134), hereby ORDERS as follows: (1) With regard to the dispute as to Defendant's Interrogatory ("ROG") No. 7, Defendant's request is GRANTED and Plaintiff must supplement its answer to that ROG, providing a fulsome answer to the question therein, no later than 30 days from today's date. In a matter where the Complaint was first filed back in October 2022, Plaintiff should know (and should have known for a long time now) what its view is about whether any of its products read on the asserted claims (a relevant issue in this case as to damages, validity and perhaps claim construction), and should have anticipated for months or years that this issue would raise its head in the case. Defendant is entitled to a timely answer to ROG No. 7, for the reasons set out in its briefing. (D.I. 129 at 1-2); cf. <i>Pers. Audio, LLC v. Google LLC</i> , Civil Action No. 17-1751-CFC-CJB, 2018 WL 4502002, at *2 (D. Del. Sept. 20, 2018). No additional discovery is needed for Plaintiff to be able to answer the question, and Plaintiff should be required to do so in a reasonably prompt fashion. And with regard to Plaintiff's objection to providing claim charts in response, (D.I. 130 at 2), if Plaintiff is going to take the position that its products read on the patents and that this fact is helpful to it in the case (e.g., regarding damages issues, or objective indicia-related issues), the Court does not see how Defendant could adequately evaluate the merit of that assertion without having the benefit of something like a claim-by-claim explanation as to why the product reads on the patent's claims. That said, if Plaintiff does take the view that certain of its products read on certain of the asserted claims, and if it can think of some other narrative way to provide a detailed response to ROG No. 7 that explains why that is so (other than via a "claim chart"), it may do so. See <i>PersonalWeb Techs., LLC v. Google Inc.</i> , No. C13-01317 EJD (HRL), 2014 WL 4088201, at *5 (N.D. Cal. Aug. 19, 2014) (requiring a party in Plaintiff's position to provide a "full substantive response" to a similar interrogatory); see also <i>Apple Inc. v. Wi-LAN Inc.</i> , Case No.: 14cv2235-DMS (BLM), 2018 WL 733740, at *3 (S.D. Cal. Feb. 6, 2018); (2) With regard to the dispute as to Defendant's ROG No. 3, Defendant's request is also GRANTED, for similar reasons. Plaintiff must supplement its answer to that ROG by no later than 30 days from today's date, identifying (as was requested by the ROG): (a) a date certain as to conception and reduction to practice regarding the subject matter of each asserted patent (and not by listing a date, preceded by the words "no later than"), see <i>Karl Storz Endoscopy-Am., Inc. v. Stryker Corp.</i> , Case No. 14-cv-00876-RS (JSC), 2017 WL 3888869, at *3 (N.D. Cal. Apr. 17, 2017); and (b) some narrative explanation of the facts and circumstances that relate to the conception and reduction to practice of the inventions, see <i>Sysmex Corp. v. Beckman Coulter, Inc.</i> , Civil Action No. 19-1642-GBW-CJB, D.I. 80 (D. Del. May 13, 2020). The information is relevant to the case for the reasons Defendant says, it is the type of information that Plaintiff should have long known would be required to be produced, and it is information that, to a significant degree, is in Plaintiff's hands; and (3) As to both of the supplemental answers, Plaintiff will be supplementing based on the knowledge and information available to it as of the date of its service of the answers. But contrary to Plaintiff's concerns, those supplemental answers are not necessarily "final" answers. (D.I. 130 at 3) Of course if additional information comes to light that causes Plaintiff to learn that its prior responses were incomplete or incorrect, Plaintiff can (and, indeed must) further supplement the response at issue. Fed. R. Civ. P. 26(e); see also (D.I. 134 at 1). Ordered by Judge Christopher J. Burke on 8/5/2024. (smg) (Entered: 08/05/2024)
08/05/2024	146	NOTICE OF SERVICE of LAM Research Corp.'s First Supplemental Responses and Objections to Inpria Corporation's Second Set of Interrogatories (Nos. 14-16) filed by Lam Research Corp..(Gorman, John) (Entered: 08/05/2024)
08/07/2024	147	NOTICE OF SERVICE of Inpria's Third Set of Requests for Production of Documents and Things to Lam (Nos. 50-78) filed by Inpria Corporation.(Vrana, Robert) (Entered: 08/07/2024)
08/07/2024	148	[SEALED] MOTION to Amend/Correct 43 Amended Complaint - filed by Inpria Corporation. (Attachments: # 1 Exhibit 1 - Second Amended and Supplemental Complaint, # 2 Exhibits A-L to Second Amended and Supplemental Complaint, # 3 Exhibits M-Y to Second Amended and Supplemental Complaint, # 4 Exhibits Z-HH to Second Amended and Supplemental Complaint, # 5 Exhibits II-RR to Second Amended and Supplemental Complaint, # 6 Exhibit 2 - Redline version of Second Amended and Supplemental Complaint, # 7 Text of Proposed Order)(Poff, Adam) (Entered: 08/07/2024)
08/07/2024	149	MOTION for Leave to File an Amended Answer to Inpria Corp.'s Complaint and New Counterclaims - filed by Lam Research Corp.. (Attachments: # 1 Text of Proposed Order, # 2 Exhibit 4 to Amended Answer, # 3 Exhibit 5 to Amended Answer, # 4 Exhibit 6 to Amended Answer)(Gorman, John) (Entered: 08/07/2024)
08/07/2024	150	[SEALED] EXHIBIT re 149 MOTION for Leave to File an Amended Answer to Inpria Corp.'s Complaint and New Counterclaims - Proposed Amended Answer by Lam Research Corp.. (Attachments: # 1 Redline Version, # 2 Exhibit 1 to Amended Answer, # 3 Exhibit 2 to Amended Answer, # 4 Exhibit 3 to Amended Answer, # 5 Exhibit 7 to Amended Answer, # 6 Certificate of Service)(Gorman, John) (Entered: 08/07/2024)
08/07/2024	151	[SEALED] Letter to The Honorable Christopher J. Burke from John V. Gorman regarding regarding request for leave to file an Amended Answer - re 149 MOTION for Leave to File an Amended Answer to Inpria Corp.'s Complaint and New Counterclaims, 150 Exhibit to a Document., (Attachments: # 1 Certificate of Service)(Gorman, John) (Entered: 08/07/2024)
08/12/2024	152	NOTICE OF SERVICE of Lam Research Corp.'s Second Set of Interrogatories to Inpria (Nos. 8-14) filed by Lam Research Corp..(Gorman, John) (Entered: 08/12/2024)
08/13/2024	153	STIPULATION and [Proposed] Order Modifying Deadlines re 148 MOTION to Amend/Correct 43 Amended Complaint , 149 MOTION for Leave to File an Amended Answer to Inpria Corp.'s Complaint and New Counterclaims by Inpria Corporation. (Poff, Adam) (Entered: 08/13/2024)
08/14/2024	154	STIPULATION and [Proposed] Order Modifying Claim Construction Deadlines by Inpria Corporation. (Poff, Adam) (Entered: 08/14/2024)
08/14/2024		SO ORDERED, D.I. 153 Stipulation and Order Modifying Deadlines re D.I. 148 and D.I. 149 , filed by Inpria Corporation. (Answering Brief due 8/21/2024, Reply Brief due 8/28/2024.) Ordered by Judge Christopher J. Burke on 8/14/2024. (smg) (Entered: 08/14/2024)
08/14/2024	155	REDACTED VERSION of 148 MOTION to Amend/Correct 43 Amended Complaint by Inpria Corporation. (Attachments: # 1 Exhibit 1, # 2 Exhibit A - L, # 3 Exhibit M - Y, # 4 Exhibit Z - HH, # 5 Exhibit II - RR, # 6 Exhibit 2, # 7 Text of Proposed Order)(Poff, Adam) (Entered: 08/14/2024)
08/14/2024		SO ORDERED, D.I. 154 Stipulation and Order Modifying Claim Construction Deadlines filed by Inpria Corporation. Setting Deadlines: (Joint Claim Construction Brief due by 10/18/2024.) Ordered by Judge Christopher J. Burke on 8/14/2024. (smg) (Entered: 08/14/2024)
08/14/2024	156	REDACTED VERSION of 151 Letter, to the Honorable Christopher J. Burke from LAM Research Corp. Regarding Request for Leave to File an Amended Answer by Lam Research Corp.. (Gorman, John) (Entered: 08/14/2024)
08/14/2024	157	REDACTED VERSION of 150 Exhibit to a Document, by Lam Research Corp.. (Attachments: # 1 Redline Version, # 2 Exhibit 1, # 3 Exhibit 2, # 4 Exhibit 3, # 5 Exhibit 7)(Gorman, John) (Entered: 08/14/2024)
08/19/2024	158	NOTICE OF SERVICE of Lam Research Corp.'s First Supplemental Responses and Objections to Inpria Corporation's Second Set of Interrogatories (Nos. 4-13) filed by Lam Research Corp..(Gorman, John) (Entered: 08/19/2024)
08/21/2024	159	NOTICE OF SERVICE of Plaintiff's Opening Claim Construction Brief filed by Inpria Corporation.(Poff, Adam) (Entered: 08/21/2024)
08/21/2024	160	[SEALED] Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Plaintiff's Opposition to Defendant's Motion for Leave to File an Amended Answer. (Poff, Adam) (Entered: 08/21/2024)
08/21/2024	161	DECLARATION re 160 Letter of Chetan R. Bansal by Inpria Corporation. (Attachments: # 1 Exhibit 1 - 6)(Poff, Adam) (Entered: 08/21/2024)
08/21/2024	162	Letter to The Honorable Christopher J. Burke from John V. Gorman regarding Plaintiff Inpria Corporation's request for leave to file an Amended Complaint. (Gorman, John) (Entered: 08/21/2024)
08/22/2024	163	NOTICE OF SERVICE of notice of its intent to serve subpoena (Notice of Subpoena to Produce Documents, Electronically Stored Information, and Things to The Research Foundation for the State University of New York) filed by Lam Research Corp..(Barillare, Jody) (Entered: 08/22/2024)
08/27/2024	164	NOTICE OF SERVICE of Inpria Corporation's Notice of Subpoena to Entegris, Inc. filed by Inpria Corporation.(Vrana, Robert) (Entered: 08/27/2024)
08/28/2024	165	REDACTED VERSION of 160 Letter by Inpria Corporation. (Poff, Adam) (Entered: 08/28/2024)

08/28/2024	166	Letter to The Honorable Christopher J. Burke from John V. Gorman regarding reply letter brief in support of its Request for Leave to File an Amended Answer - re 151 Letter,. (Gorman, John) (Entered: 08/28/2024)
08/29/2024	167	ORAL ORDER: The Court hereby ORDERS as follows: (1) A videoconference to hear argument on Defendant's Motion for Leave to File an Amended Answer ("Defendant's Motion"), (D.I. 149), is set for October 15, 2024 at 1:00 p.m. before Judge Christopher J. Burke via the Microsoft Teams platform. By no later than October 4, 2024, the parties shall send an e-mail to the Court's Courtroom Deputy, Ms. Grimes, indicating the names and e-mail addresses of all individuals who will participate in the hearing. The Court may choose to resolve the Motion prior to the videoconference and will, in that event, cancel the videoconference (however, if any party advises the Court in advance that a newer attorney will argue the dispute, see Standing Order Regarding Courtroom Opportunities for Newer Attorneys, https://www.ded.uscourts.gov/sites/ded/files/StandingOrder2017.pdf , then the Court will go forward with the conference); and (2) The Court has reviewed Plaintiff's Motion for Leave to File Second Amended and Supplemental Complaint ("Plaintiff's Motion"), (D.I. 148), and Defendant's answering letter indicating that it does not oppose Plaintiff's Motion, (D.I. 162), and hereby ORDERS that Plaintiff's Motion is GRANTED. By no later than September 3, 2024, Plaintiff shall formally file its proposed Second Amended and Supplemental Complaint. Ordered by Judge Christopher J. Burke on 8/29/2024. (mpb) (Entered: 08/29/2024)
08/30/2024	168	NOTICE OF SERVICE of 1) Inpria Corporation's Notice of Subpoena to Gelest, Inc., and 2) Inpria Corporation's Notice of Amended Subpoena to Entegris, Inc. filed by Inpria Corporation.(Mackrides, Daniel) (Entered: 08/30/2024)
09/03/2024	169	[SEALED] Second AMENDED COMPLAINT against Lam Research Corp.- filed by Inpria Corporation. (Attachments: # 1 Exhibit A - L, # 2 Exhibit M - Y, # 3 Exhibit Z - HH, # 4 Exhibit II-RR)(Poff, Adam) (Entered: 09/03/2024)
09/05/2024	170	NOTICE OF SERVICE of 1) Plaintiff's Second Supplemental Objections and Responses to Defendant's First Set of Interrogatories (Nos. 17) filed by Inpria Corporation.(Mackrides, Daniel) (Entered: 09/05/2024)
09/05/2024	171	NOTICE OF SERVICE of Lam Research Corp.'s Responses and Objections to Inpria's Third Set of Requests for Production of Documents and Things (Nos. 50-78) filed by Lam Research Corp..(Gorman, John) (Entered: 09/05/2024)
09/10/2024	172	REDACTED VERSION of 169 Amended Complaint <i>/Second AMENDED COMPLAINT against Lam Research Corp</i> by Inpria Corporation. (Attachments: # 1 Exhibit A through L, # 2 Exhibit M through Y, # 3 Exhibit Z through HH, # 4 Exhibit II through RR)(Vrana, Robert) (Entered: 09/10/2024)
09/12/2024	173	NOTICE OF SERVICE of Plaintiff's Objections and Responses to Defendant's Second Set of Interrogatories to Inpria (Nos. 8-14) filed by Inpria Corporation.(Vrana, Robert) (Entered: 09/12/2024)
09/17/2024	174	[SEALED] ANSWER to Amended Complaint, re: 169 Amended Complaint with JURY DEMAND , COUNTERCLAIM against Lam Research Corp. by Lam Research Corp.. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Exhibit 3, # 4 Exhibit 4, # 5 Exhibit 5, # 6 Exhibit 6, # 7 Exhibit 7, # 8 Certificate of Service)(Gorman, John) (Entered: 09/17/2024)
09/18/2024	175	NOTICE OF SERVICE of Lam Research Corp.'s Responsive Claim Construction Brief filed by Lam Research Corp..(Gorman, John) (Entered: 09/18/2024)
09/24/2024	176	REDACTED VERSION of 174 Answer to Amended Complaint,, Counterclaim, by Lam Research Corp.. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Exhibit 3, # 4 Exhibit 4, # 5 Exhibit 5, # 6 Exhibit 6, # 7 Exhibit 7)(Gorman, John) (Entered: 09/24/2024)
09/26/2024	177	NOTICE OF SERVICE of Corrected Exhibit O to Defendants' Responsive Claim Construction Brief filed by Lam Research Corp..(Gorman, John) (Entered: 09/26/2024)
10/01/2024	178	NOTICE OF SERVICE of Lam Research Corp.'s First Amended ESI Disclosures filed by Lam Research Corp..(Gorman, John) (Entered: 10/01/2024)
10/03/2024	179	NOTICE OF SERVICE of Plaintiff's Amended Second Supplemental Objections and Responses to Defendant's First Set of Interrogatories (Nos. 17) filed by Inpria Corporation.(Poff, Adam) (Entered: 10/03/2024)
10/03/2024	180	NOTICE OF SERVICE of Plaintiff's Reply Claim Construction Brief filed by Inpria Corporation.(Vrana, Robert) (Entered: 10/03/2024)
10/04/2024	181	MOTION for Pro Hac Vice Appearance of Attorney Joshua M. Bennett and Sachiko Taniguchi - filed by Inpria Corporation. (Mackrides, Daniel) (Entered: 10/04/2024)
10/04/2024	182	Pro Hac Vice Fee - Credit Card Payment received for Joshua M. Bennett and Sachiko Taniguchi. (re 181 MOTION for Pro Hac Vice Appearance of Attorney Joshua M. Bennett and Sachiko Taniguchi)(Payment of \$ 100, receipt number ADEDC-4516223).(Mackrides, Daniel) (Entered: 10/04/2024)
10/04/2024		SO ORDERED, D.I. 181 MOTION for Pro Hac Vice Appearance of Attorney Joshua M. Bennett and Sachiko Taniguchi filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 10/4/2024. (smg) (Entered: 10/04/2024)
10/07/2024	183	NOTICE OF SERVICE of Plaintiff's First Supplemental Objections and Responses to Defendant's Second Set of Interrogatories to Inpria (Nos. 8-14). filed by Inpria Corporation.(Vrana, Robert) (Entered: 10/07/2024)
10/07/2024		Pro Hac Vice Attorney Sachiko Taniguchi, Joshua M. Bennett for Inpria Corporation added for electronic noticing. Pursuant to Local Rule 83.5 (d), Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (cdd) (Entered: 10/07/2024)
10/08/2024	184	MOTION to Strike, or Dismiss, Defendant's New Counterclaims and Defenses re 174 Answer to Amended Complaint,, Counterclaim, - filed by Inpria Corporation. (Attachments: # 1 Text of Proposed Order)(Vrana, Robert) (Entered: 10/08/2024)
10/08/2024	185	[SEALED] OPENING BRIEF in Support re 184 MOTION to Strike, or Dismiss, Defendant's New Counterclaims and Defenses re 174 Answer to Amended Complaint,, Counterclaim, filed by Inpria Corporation.Answering Brief/Response due date per Local Rules is 10/22/2024. (Vrana, Robert) (Entered: 10/08/2024)
10/08/2024	186	DECLARATION re 184 MOTION to Strike, or Dismiss, Defendant's New Counterclaims and Defenses re 174 Answer to Amended Complaint,, Counterclaim, of <i>Chetan R. Bansal</i> by Inpria Corporation. (Attachments: # 1 Exhibit A - G)(Vrana, Robert) (Entered: 10/08/2024)
10/09/2024	187	Letter to The Honorable Christopher J. Burke from John V. Gorman regarding notifying the Court of events relating to Defendant's pending motion for leave to file an amended answer - re 167 Oral Order & 149 MOTION for Leave to File an Amended Answer to Inpria Corp.'s Complaint and New Counterclaims. (Gorman, John) Modified on 10/9/2024 (smg). (Entered: 10/09/2024)
10/09/2024	188	Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding October 15, 2024 oral hearing. (Poff, Adam) (Entered: 10/09/2024)
10/10/2024	189	ORAL ORDER: The Court has reviewed Defendant's motion for leave to file an amended Answer to Plaintiff's First Amended Complaint ("FAC"). (D.I. 149 ("motion to amend the Answer to the FAC")) It has also reviewed the parties' recent letters regarding the currently-scheduled October 15 hearing on the motion to amend the Answer to the FAC, as well as regarding events that have occurred subsequent to the scheduling of that October 15 hearing, including: (1) Plaintiff's filing of a Second Amended Complaint ("SAC"), (D.I. 169); (2) Defendant's filing of an Answer to the SAC, (D.I. 174); and (3) Plaintiff's filing of a motion to strike portions of Defendant's Answer to the SAC ("motion to strike"), (D.I. 184). (D.I. 187 ; D.I. 188) In light of these subsequent events, the Court hereby DENIES as MOOT the motion to amend the Answer to the FAC, as that motion sought to amend an Answer that is no longer operative (an Answer to a complaint that is itself no longer operative). The Court thus also ORDERS that the October 15, 2024 hearing is CANCELED. Any ongoing disputes with regard to Defendant's ability to include certain defenses and counterclaims in its now-operative Answer shall be addressed when the Court resolves Plaintiff's motion to strike, which has not yet finished briefing. Ordered by Judge Christopher J. Burke on 10/10/2024. (smg) (Entered: 10/10/2024)
10/10/2024	190	PROPOSED ORDER Supplemental ESI Discovery Order by Inpria Corporation. (Poff, Adam) (Entered: 10/10/2024)
10/10/2024		SO ORDERED, D.I. 190 Proposed Supplemental EDI Discovery Order filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 10/10/2024. (smg) (Entered: 10/11/2024)
10/16/2024	191	NOTICE OF SERVICE of Lam Research Corp.'s Sur-Reply Claim Construction Brief filed by Lam Research Corp..(Gorman, John) (Entered: 10/16/2024)
10/16/2024	192	MOTION for Pro Hac Vice Appearance of Attorney Karon N. Fowler - filed by Lam Research Corp.. (Attachments: # 1 Certification of Karon N. Fowler)(Gorman, John) (Entered: 10/16/2024)
10/16/2024	193	Pro Hac Vice Fee - Credit Card Payment received for Karon N. Fowler. (re 192 MOTION for Pro Hac Vice Appearance of Attorney Karon N. Fowler)(Payment of \$ 50, receipt number ADEDC-4524759).(Gorman, John) (Entered: 10/16/2024)
10/16/2024		SO ORDERED, D.I. 192 MOTION for Pro Hac Vice Appearance of Attorney Karon N. Fowler filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 10/16/2024. (smg) (Entered: 10/16/2024)
10/16/2024		Pro Hac Vice Attorney Karon N. Fowler for Lam Research Corp. added for electronic noticing. Pursuant to Local Rule 83.5 (d), Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (cdd) (Entered: 10/16/2024)
10/17/2024	194	REDACTED VERSION of 185 Opening Brief in Support, by Inpria Corporation. (Vrana, Robert) (Entered: 10/17/2024)
10/18/2024	195	NOTICE OF SERVICE of Subpoena to Produce Documents, Electronically Stored Information, and Things to Oregon State University filed by Lam Research Corp..(Gorman, John) (Entered: 10/18/2024)
10/18/2024	196	Letter to the Honorable Christopher J. Burke from John V. Gorman regarding submission of Defendant Lam Research Corp.'s tutorial on the technology at issue by secure file transfer - re 59 Scheduling Order. (Gorman, John) Modified on 10/21/2024 (smg). (Entered: 10/18/2024)
10/18/2024	197	Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Inpria Corporation's Technology Tutorial - re 59 Scheduling Order. (Poff, Adam) Modified on 10/21/2024 (smg). (Entered: 10/18/2024)
10/18/2024	198	NOTICE of Lodging of Inpria Corporation's Technology Tutorial by Inpria Corporation re 197 Letter (Poff, Adam) (Entered: 10/18/2024)
10/18/2024	199	JOINT CLAIM CONSTRUCTION BRIEF filed by Inpria Corporation. (Poff, Adam) (Main Document 199 replaced on 10/28/2024) (smg). (Entered: 10/18/2024)
10/18/2024	200	Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Claim Construction Hearing. (Poff, Adam) (Entered: 10/18/2024)
10/18/2024	201	MOTION for Claim Construction re 199 Joint Claim Construction Brief - filed by Inpria Corporation. (Poff, Adam) (Entered: 10/18/2024)
10/18/2024	202	Joint APPENDIX re 199 Joint Claim Construction Brief <i>Volume 1 of 2 (Part I)</i> by Inpria Corporation. (Attachments: # 1 Part 1.1 Declaration Of Phillip W. Citron, # 2 Part 1.2 (Exhibits 1 - 15), # 3 Part 1.3 (Exhibits 16 - 30), # 4 Part 1.4 (Exhibits 31 - 38), # 5 Part 1.5 (Exhibits 39 - 45), # 6 Part 1.6 (Exhibits 46 - 48))(Poff, Adam) (Attachment 1 replaced on 10/28/2024) (smg). (Entered: 10/18/2024)
10/18/2024	203	Joint APPENDIX re 199 Joint Claim Construction Brief <i>Volume 2 of 2 (Parts II and III)</i> by Inpria Corporation. (Attachments: # 1 Part II Declaration of Michael J. Lyons (Exhibits A - P), # 2 Part III Declaration of Michael J. Lyons (Exhibits Q - AC))(Poff, Adam) (Entered: 10/18/2024)
10/18/2024	204	MOTION to Adopt Claim Construction Positions of Lam set forth in the Joint Claim Construction Brief re 199 Joint Claim Construction Brief - filed by Lam Research Corp.. (Gorman, John) (Entered: 10/18/2024)

10/21/2024	205	MULTI MEDIA DOCUMENT filed by Inpria Corporation in the form of a 2 USB drives. Filing related to 198 Notice (Other). (Media on file in Clerk's Office). (smg) (Entered: 10/21/2024)
10/22/2024	206	NOTICE of Lodging of Defendant Lam Research Corp.'s Technology Tutorial on USB drive by Lam Research Corp. (Gorman, John) (Entered: 10/22/2024)
10/22/2024	207	ANSWERING BRIEF in Opposition re 184 MOTION to Strike, or Dismiss, Defendant's New Counterclaims and Defenses re 174 Answer to Amended Complaint,, Counterclaim, filed by Lam Research Corp..Reply Brief due date per Local Rules is 10/29/2024. (Gorman, John) (Entered: 10/22/2024)
10/23/2024	208	MULTI MEDIA DOCUMENT filed by Lam Research Corp. in the form of a 2 USB Drives. Filing related to D.I. 206 Notice of Lodging. (Media on file in Clerk's Office). (smg) (Entered: 10/23/2024)
10/23/2024	209	NOTICE OF SERVICE of Lam Research Corp.'s Second Supplemental Responses and Objections to Inpria Corporation's Second Set of Interrogatories (Nos. 4-13) filed by Lam Research Corp..(Gorman, John) (Entered: 10/23/2024)
10/25/2024	210	STATEMENT <i>Plaintiff Inpria Corporation's Comments Regarding Defendant Lam Research Corp.'s Technology Tutorial</i> by Inpria Corporation. (Poff, Adam) (Entered: 10/25/2024)
10/28/2024		CORRECTING ENTRY: Main document of D.I. 199 and attachment 1 of D.I. 202 have been replaced per the request of filing counsel to correct citations. (smg) (Entered: 10/28/2024)
10/29/2024	211	NOTICE OF SERVICE of Plaintiff's Second Amended and Supplemental Objections and Responses to Defendant's Second Set of Interrogatories to Inpria (Nos. 8-14) filed by Inpria Corporation.(Poff, Adam) (Entered: 10/29/2024)
10/29/2024	212	REPLY BRIEF re 184 MOTION to Strike, or Dismiss, Defendant's New Counterclaims and Defenses re 174 Answer to Amended Complaint,, Counterclaim, filed by Inpria Corporation. (Poff, Adam) (Entered: 10/29/2024)
10/29/2024	213	DECLARATION re 212 Reply Brief of <i>Chetan R. Bansal</i> by Inpria Corporation. (Attachments: # 1 Exhibit A)(Poff, Adam) (Entered: 10/29/2024)
11/04/2024	214	ORAL ORDER: The Court, having reviewed the parties' October 18, 2024 letter regarding the November 6, 2024 Markman hearing, (D.I. 200), hereby ORDERS as follows: (1) The Court hereby ADOPTS the parties' proposal regarding time allocation. Three hours will be allocated for argument, to be split equally between the parties. The Court also ADOPTS the parties' proposals for the order of terms and which side will present argument first for each term.; and (2) On or before 6 p.m. EST on November 5, 2024, Delaware and lead counsel for the parties shall meet and confer and file an amended joint claim construction chart that sets forth the terms/issues that remain in dispute. The meet and confer shall focus on an attempt to reach agreement on any remaining disputed terms/issues where possible and on an attempt to focus the disputes over the remaining terms/issues in light of the parties' claim construction briefing. In a joint letter that the parties shall submit by 6 p.m. EST on November 5, 2024, the parties shall: (a) identify by name each individual who participated in this meet and confer, when and how that meet and confer occurred and how long it lasted; and (b) list, for each term remaining to be argued, what they understand the parties' remaining disputes about the construction of that term to be (i.e., "The parties' [first/only] dispute as to this term is whether [describe dispute]."), including no more than one sentence to describe each dispute. If no agreements on constructions have been reached or if no dispute has been narrowed on the meet and confer, the letter shall so state and the parties need not file an amended joint claim construction chart. Ordered by Judge Christopher J. Burke on 11/4/2024. (smg) (Entered: 11/04/2024)
11/04/2024	215	MOTION for Pro Hac Vice Appearance of Attorney Joseph J. Rumppler II - filed by Inpria Corporation. (Mackrides, Daniel) (Entered: 11/04/2024)
11/04/2024	216	Pro Hac Vice Fee - Credit Card Payment received for Joseph J. Rumppler II. (re 215 MOTION for Pro Hac Vice Appearance of Attorney Joseph J. Rumppler II)(Payment of \$ 50, receipt number ADEDC-4539696)(Mackrides, Daniel) (Entered: 11/04/2024)
11/04/2024	217	REQUEST for Oral Argument by Lam Research Corp. re 184 MOTION to Strike, or Dismiss, Defendant's New Counterclaims and Defenses re 174 Answer to Amended Complaint,, Counterclaim, . (Gorman, John) (Entered: 11/04/2024)
11/05/2024	218	REQUEST for Oral Argument by Inpria Corporation re 184 MOTION to Strike, or Dismiss, Defendant's New Counterclaims and Defenses re 174 Answer to Amended Complaint,, Counterclaim, . (Mackrides, Daniel) (Entered: 11/05/2024)
11/05/2024	219	MOTION for Exemption of Persons from the District of Delaware's May 17, 2024 Standing Order on Personal Devices - filed by Inpria Corporation. (Attachments: # 1 Text of Proposed Order)(Poff, Adam) (Entered: 11/05/2024)
11/05/2024	220	Joint Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Markman Hearing. (Poff, Adam) (Entered: 11/05/2024)
11/05/2024	221	Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Amended Joint Claim Construction Chart. (Attachments: # 1 Amended Joint Claim Construction Chart, # 2 Redline Joint Claim Construction Chart)(Poff, Adam) (Entered: 11/05/2024)
11/05/2024	224	ORAL ORDER: The Court, having reviewed Defendant's motion to strike ("Motion"), (D.I. 184), hereby ORDERS that the Court will plan to resolve the Motion on the papers, unless: (a) it determines after reviewing the briefing that oral argument is needed; or (b) any party advises the Court in advance that, were argument to be set, a newer attorney will argue the Motion, <i>see</i> Standing Order Regarding Courtroom Opportunities for Newer Attorneys, https://www.ded.uscourts.gov/sites/ded/files/StandingOrder2017.pdf . If either of those circumstances occurs, then the Court will schedule oral argument on the Motion in the future. Ordered by Judge Christopher J. Burke on 11/5/2024. (smg) (Entered: 11/06/2024)
11/06/2024	222	ORDER GRANTING D.I. 219 MOTION for Exemption of Persons from the District of Delaware's May 17, 2024 Standing Order on Personal Devices . Signed by Judge Christopher J. Burke on 11/6/2024. (smg) (Entered: 11/06/2024)
11/06/2024		SO ORDERED, D.I. 215 MOTION for Pro Hac Vice Appearance of Attorney Joseph J. Rumppler II filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 11/6/2024. (smg) (Entered: 11/06/2024)
11/06/2024	223	Joint Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Discovery Dispute. (Poff, Adam) (Entered: 11/06/2024)
11/06/2024		Minute Entry for proceedings held before Judge Christopher J. Burke - Markman Hearing held on 11/6/2024. The Court heard argument from the parties regarding certain of the disputed terms. (D.I. 201 ; D.I. 204) The Court took the matter under advisement. (Clerk: E. Rose; Court reporter: Deanna Warner) Appearances: J. Rumppler, P. Anderson. P. Citroen, J. Palys, A. Poff, and D. Mackrides for Plaintiff; J. Gorman, M. Lyons, A. Hsu-Hoffman, A. Patitucci, and P. Wolfe for Defendant. (smg) (Entered: 11/06/2024)
11/07/2024	225	ORAL ORDER: The Court, having reviewed the parties' November 6, 2024 letter regarding Plaintiff's two discovery disputes, (D.I. 223), hereby ORDERS as follows: (1) By November 13, 2024, the parties shall jointly file a Motion to Resolve Discovery Dispute.; (2) By November 13, 2024, Plaintiff shall file with the Court a letter, not to exceed three (3) single-spaced pages, in no less than 12-point font, outlining the issues in dispute and its position on those issues.; (3) By November 20, 2024, Defendant may file a letter, not to exceed three (3) single-spaced pages, in no less than 12-point font, outlining Defendant's reasons for its opposition.; (4) By November 27, 2024, Plaintiff shall file with the Court a reply letter brief, not to exceed one (1) single-spaced page, in no less than 12-point font.; (5) The parties should also consult and follow Judge Burke's "Guidelines for Discovery Disputes," which is found in the "Guidelines" tab on Judge Burke's portion of the District Court's website.; and (6) The Court will plan to resolve the disputes on the papers, unless: (a) it determines after reviewing the briefing that oral argument is needed; or (b) any party advises the Court in advance that, were argument to be set, a newer attorney will argue the dispute(s), <i>see</i> Standing Order Regarding Courtroom Opportunities for Newer Attorneys, https://www.ded.uscourts.gov/sites/ded/files/StandingOrder2017.pdf . If either of those circumstances occurs, then the Court will schedule oral argument on the dispute(s) in the future. Ordered by Judge Christopher J. Burke on 11/7/2024. (smg) (Entered: 11/07/2024)
11/07/2024		NOTICE: Per Magistrate Judge Burke's Standing Order Regarding Courtesy Copies, which requires two (2) courtesy copies of all briefs (including letter briefs), as well as any documents filed in support of such briefs (i.e., appendices, exhibits, declarations, affidavits, tutorials, etc.) and one (1) copy of any other document filed (e.g., letters and stipulations), please submit to the Clerk's Office copies of D.I. # 207 . (smg) (Entered: 11/07/2024)
11/08/2024	226	NOTICE of Resubmission of Claim Construction Exhibits by Lam Research Corp. (Attachments: # 1 Declaration of Michael J. Lyons (Exhibits A to P), # 2 Declaration of Michael J. Lyons (Exhibits Q to AC))(Gorman, John) (Entered: 11/08/2024)
11/08/2024	227	NOTICE of Lodging of Demonstrative Slides by Lam Research Corp. (Attachments: # 1 Exhibit A)(Gorman, John) (Entered: 11/08/2024)
11/13/2024	228	Joint MOTION Resolve Discovery Dispute re 225 Oral Order,,,,,, - filed by Inpria Corporation. (Poff, Adam) (Entered: 11/13/2024)
11/13/2024	229	[SEALED] Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Inpria's Opening Discovery Dispute Letter - re 228 Joint MOTION Resolve Discovery Dispute re 225 Oral Order,,,,,, . (Poff, Adam) (Entered: 11/13/2024)
11/13/2024	230	[SEALED] APPENDIX re 229 Letter <i>Volume 1 of 2 (Exhibits A, C - R)</i> by Inpria Corporation. (Attachments: # 1 Exhibit A, # 2 Exhibit C - R)(Poff, Adam) (Entered: 11/13/2024)
11/13/2024	231	[SEALED] APPENDIX re 229 Letter <i>Volume 2 of 2 (Exhibits B, I - 94)</i> by Inpria Corporation. (Attachments: # 1 Exhibit B, # 2 Exhibit I - 9, # 3 Exhibit 10 - 17, # 4 Exhibit 18 - 24, # 5 Exhibit 25 - 35, # 6 Exhibit 36 - 59, # 7 Exhibit 60 - 79, # 8 Exhibit 80 - 94)(Poff, Adam) (Entered: 11/13/2024)
11/17/2024	232	Official Transcript of Markman Hearing held on 11/6/24 before Judge Christopher Burke. Court Reporter Deanna Warner, Email: deanna_warner@ded.uscourts.gov . Transcript may be viewed at the court public terminal or order/purchased through the Court Reporter before the deadline for Release of Transcript Restriction. After that date, it may be obtained through PACER. Redaction Request due 12/9/2024. Redacted Transcript Deadline set for 12/18/2024. Release of Transcript Restriction set for 2/17/2025. (Warner, Deanna) (Entered: 11/17/2024)
11/19/2024		Pro Hac Vice Attorney Joseph J. Rumppler, II for Inpria Corporation added for electronic noticing. Pursuant to Local Rule 83.5 (d), Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (cdd) (Entered: 11/19/2024)
11/20/2024	233	STIPULATION TO EXTEND TIME for Inpria Corporation to file public versions of its Letter Brief Requesting Defendant Lam Research Corporation Run Disputed Search Terms and Designate Additional Custodians and the supporting Appendices (D.I. 229-31) to November 27, 2024 - filed by Inpria Corporation. (Poff, Adam) Modified on 11/20/2024 (smg). (Entered: 11/20/2024)
11/20/2024		SO ORDERED, D.I. 233 STIPULATION TO EXTEND TIME for Inpria Corporation to file public versions of its Letter Brief Requesting Defendant Lam Research Corporation Run Disputed Search Terms and Designate Additional Custodians and the supporting Appendices (D.I. 229 - 231) to November 27, 2024 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 11/20/2024. (smg) (Entered: 11/20/2024)
11/20/2024	234	[SEALED] Letter to The Honorable Christopher J. Burke from John V. Gorman regarding Letter Brief in Answer to Plaintiff's Letter Brief Requesting Defendant Run Disputed Search Terms and Designate Additional Custodians - re 229 Letter. (Attachments: # 1 Exhibit AD, # 2 Exhibit AE, # 3 Exhibit AF, # 4 Exhibit AG, # 5 Exhibit AH, # 6 Exhibit AI)(Gorman, John) (Entered: 11/20/2024)
11/20/2024	235	EXHIBIT AA-AC to D.I. 234 Letter, by Lam Research Corp.. (Attachments: # 1 Exhibit AB, # 2 Exhibit AC)(Gorman, John) Modified on 11/21/2024 (smg). (Entered: 11/20/2024)
11/21/2024		NOTICE: Per Magistrate Judge Burke's Standing Order Regarding Courtesy Copies, which requires two (2) courtesy copies of all briefs (including letter briefs), as well as any documents filed in support of such briefs (i.e., appendices, exhibits, declarations, affidavits, tutorials, etc.) and one (1) copy of any other document filed (e.g., letters and stipulations), please submit to the Clerk's Office two copies of D.I. # 234 & D.I. 235 . (smg) (Entered: 11/21/2024)
11/27/2024	236	REDACTED VERSION of 229 Letter by Inpria Corporation. (Poff, Adam) (Entered: 11/27/2024)

11/27/2024	237	REDACTED VERSION of 230 Appendix <i>Volume 1 of 2</i> by Inpria Corporation. (Attachments: # 1 Exhibit A, # 2 Exhibit C - R)(Poff, Adam) (Entered: 11/27/2024)
11/27/2024	238	REDACTED VERSION of 231 Appendix, by Inpria Corporation. (Attachments: # 1 Exhibit B, # 2 Exhibit 1 - 9, # 3 Exhibit 10 - 17, # 4 Exhibit 18 - 24, # 5 Exhibit 25 - 35, # 6 Exhibit 36 - 59, # 7 Exhibit 60 - 79, # 8 Exhibit 80 - 94)(Poff, Adam) (Entered: 11/27/2024)
11/27/2024	239	REDACTED VERSION of 234 Letter, by Lam Research Corp.. (Attachments: # 1 Exhibit AD, # 2 Exhibit AE, # 3 Exhibit AF, # 4 Exhibit AG, # 5 Exhibit AH, # 6 Exhibit AI)(Gorman, John) (Entered: 11/27/2024)
11/27/2024	240	[SEALED] Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Inpria's Reply Discovery Dispute Letter - re 228 Joint MOTION Resolve Discovery Dispute re 225 Oral Order,,,,,,. (Attachments: # 1 Exhibit S, # 2 Exhibit T, # 3 Exhibit U, # 4 Exhibit V, # 5 Exhibit W, # 6 Exhibit X, # 7 Exhibit Y)(Poff, Adam) (Entered: 11/27/2024)
11/27/2024	241	REQUEST for Oral Argument by Inpria Corporation re 228 Joint MOTION Resolve Discovery Dispute re 225 Oral Order,,,,,,. (Poff, Adam) (Entered: 11/27/2024)
12/04/2024	242	STIPULATION TO EXTEND TIME for Plaintiff Inpria Corporation to file a public version of its Reply Letter Brief Requesting Defendant Lam Research Corporation Run Disputed Search Terms and Designate Additional Custodians (D.I. 240) to December 11, 2024 - filed by Inpria Corporation. (Poff, Adam) (Entered: 12/04/2024)
12/04/2024		SO ORDERED, D.I. 242 STIPULATION TO EXTEND TIME for Plaintiff Inpria Corporation to file a public version of its Reply Letter Brief Requesting Defendant Lam Research Corporation Run Disputed Search Terms and Designate Additional Custodians (D.I. 240) to December 11, 2024 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 12/4/2024. (smg) (Entered: 12/04/2024)
12/11/2024	243	REDACTED VERSION of 240 Letter, by Inpria Corporation. (Attachments: # 1 Exhibit S - Y)(Poff, Adam) (Entered: 12/11/2024)
12/11/2024	244	ORAL ORDER: The Court, having reviewed the parties' motions for claim construction, (D.I. 201 ; D.I. 204), and the briefing related thereto, (D.I. 199), having considered the legal standards related to claim construction, see <i>Iyazacera Bio, LLC v. CytomX Therapeutics, Inc.</i> , Civil Action No. 20-333-LPS-CJB, 2021 WL 4621866, at *2-3 (D. Del. Oct. 7, 2021), and having held a <i>Markman</i> hearing that concluded on November 6, 2024, (D.I. 232 (hereinafter, "Tr.")), hereby addresses the construction of term 2: "coating"/ "coating material"/ "coated substrate". The Court will adopt Plaintiff's proposed construction for the term "coating" which is "material covering at least a portion of a surface of a substrate" (and Plaintiff's respective proposals for "coating material" and "coated substrate"), for the following reasons: (1) The key dispute is over whether the asserted patents' use of the term "coating" refers only to a "material formed through the deposition of a liquid precursor solution" (as Defendant asserts). (D.I. 199 at 12; see also <i>id.</i> at 13, 16) Plaintiff argues otherwise that the coatings at issue (i.e., those that initially cover the substrate) could possibly be formed through some other process (e.g., by a process which utilizes something other than a liquid solution). In the end, the Court agrees with Plaintiff, in light of the following: (a) In the "Background of the Invention" section of the 564 Patent, the patentee is discussing a process by which semiconductor-based devices are patterned in order to integrate the structure. At the end of that section, the patentee states that "[t]he process can be repeated to form additional layers of patterned material. The functional inorganic materials can be deposited using chemical vapor deposition, physical vapor deposition or other desired approaches." (564 Patent, col. 2:5-8 (emphasis added); see also Tr. at 99-101) There is no dispute that chemical vapor deposition and physical vapor deposition are methods of coating a substrate that do not utilize a liquid precursor solution. (D.I. 202 , ex. 1 at paras. 58-60) And in the Court's view, while much of the "Background" section discusses steps that occur after an initial coating is placed on the substrate, the particular sentence cited above appears to be making reference to the entire "process" leading up to the development of a pattern on a substrate—including the deposition of the initial coating onto the substrate (i.e., a necessary initial step in that "process"). See also (564 Patent, col. 1:40-43 ("Thus, the structures are generally formed through an iterative process of sequential deposition and etching steps through which a pattern is formed of the various materials."); Tr. at 101-03) Thus, if the patents here tell us that this coating process can include non-liquid precursors, then Defendant's proposed construction cannot be correct. And while Defendant's expert suggests the above-referenced text in the "Background" section does not refer to the initial coating process, (D.I. 203 , ex. Q at para. 17), it is the Court's job, not the expert's job, to perform claim construction. See <i>Symantec Corp. v. Computer Assocs. Int'l, Inc.</i> , 522 F.3d 1279, 1289 n.3 (Fed. Cir. 2008) ("To the extent that the testimony merely gives the expert's opinion as to claim construction, we attribute it no weight."); see also <i>Phillips v. AWH Corp.</i> , 415 F.3d 1303, 1318 (Fed. Cir. 2005) (en banc) (same); (b) Additionally, a sentence within the "Detailed Description of the Invention" section, which seems as if it could relate to the initial coating process, states: "[t]he further deposited material can be deposited using suitable approaches, such as solution based approaches, chemical vapor deposition (CVD), sputtering, physical vapor deposition (PVD), or other suitable approach." (564 Patent at 20:13-17 (emphasis added)); and (c) Moreover, the 564 Patent makes repeated reference to how the depositing of a precursor composition may be done using "any" one of "conventional coating approaches[.]" (<i>id.</i> , cols. 7:26-28, 14:8-13), and Plaintiff's expert explains that that the use of chemical vapor deposition, for example, was one of the main processing methods used at the time for coatings as to a wide range of applications, (D.I. 202 , ex. 1 at paras. 58-60). See also (564 Patent, cols. 7:32-36, 13:6-9; 684 Patent, col. 13:12-16 (same); 153 Patent, col. 18:36-41 (same)); and (2) Defendant's other arguments are not ultimately persuasive for the reasons that follow: (a) Defendant suggests that the specifications provide an explicit definition for the coating material at issue, where they note that it is "formed through deposition and subsequent processing of the precursor solution onto a selected substrate." (D.I. 199 at 16-17 (emphasis in original) (citing, <i>inter alia</i> , 564 Patent, col. 13:29-30)) In the Court's view, this sentence does not amount to a use of a definition. After all, a patentee typically sets out a definition of a term in much clearer language—like the patentee did here in the 153 Patent, where it signaled a definition of another term by using the phrase "is defined as[.]" (153 Patent at col. 29:61-65; see also Tr. at 91, 93) No such similar language is used in relation to coatings. See <i>Medicines Co. v. Mylan, Inc.</i> , 853 F.3d 1296, 1306 (Fed. Cir. 2017) (finding language was not definitional where it did "not accord with the linguistic formula used by the patentee to signal the designation of other defined terms"); (b) The 564 Patent states that "[t]he invention further relates to... precursor solutions that can be deposited to form a coating... [.]" (564 Patent, col. 1:30-32 (emphasis added)) Defendant argues that this reference to "solutions" would be understood as a reference to a liquid precursor solution, and that the patent's statement that the "invention" relates to the use of such a solution helps support its proposed construction. (D.I. 199 at 17 (citing D.I. 203 , ex. A para. 37)) This argument has some force. However, the claims of the patents do not use the word "solution(s)" in this same context. And in light of other evidence discussed herein, these "invention" references in the patents are insufficient to tip the scales in Defendant's favor. See <i>Absolute Software, Inc. v. Stealth Signal, Inc.</i> , 659 F.3d 1121, 1136-37 (Fed. Cir. 2011) (finding "use of the phrase 'present invention' or 'this invention' is not always so limiting, such as where the references to a certain limitation as being the 'invention' are not uniform, or where other portions of the intrinsic evidence do not support applying the limitation to the entire patent") (citing cases); <i>Zadroz Prods., Inc. v. SDI Techs., Inc.</i> , Case No. 17-1406 (WCB), 2019 WL 10252726, at *6-7 (D. Del. June 19, 2019) (same, citing cases); and (c) Defendant asserts that coatings must be limited to those deposited by liquid precursor solutions, because all examples provided in the specification are liquid-formed coatings. (D.I. 199 at 17-18) But it is well-settled law that just because listed exemplary embodiments all possess a certain quality, this does not necessarily limit the claimed invention to what is described in those embodiments. See <i>EcoServices, LLC v. Certified Aviation Servs., LLC</i> , 830 F. App'x 634, 647 (Fed. Cir. 2020). Ordered by Judge Christopher J. Burke on 12/11/2024. (smg) (Entered: 12/11/2024)
12/11/2024	245	ORAL ORDER: With regard to the parties' motions for claim construction, (D.I. 201 ; D.I. 204), the Court hereby addresses the construction of term 3: "represented by the formula $\text{RSnO}_3(3/2-x/2)(\text{OH})_x$ " / "represented by the formulation $(\text{R})\text{zSnO}_2\text{-}z/2\text{-}x/2(\text{OH})_x$ ". The parties' primary dispute concerns whether, as Defendant suggests, "formula/formulation" should be construed as "molecular formula." The Court declines to construe term 3 at this time for the reasons that follow: (1) The parties agree that the correct answer to this question comes down to dueling expert testimony, as there is not much in the intrinsic record that indicates whether inclusion of "molecular" is appropriate. (D.I. 232 (hereinafter, "Tr.") at 112, 116); (2) Here, the respective experts' views conflict. In Defendant's answering brief, it provided argument about why molecular formulas are required. (D.I. 199 at 24-27) In reply, Plaintiff cited its expert's testimony stating that term 3 could not refer to molecular formulas because it references a fractional number of atoms. (<i>Id.</i> at 27-28 (citing D.I. 202 , ex. 29 at paras. 33-37)) To that, in Defendant's sur-reply brief, it cited to its expert for the proposition that term 3's use of fractional numbers is not a barrier to Defendant's proposed construction, because some molecules may be represented by molecular formulas with fractional numbers (such as those used to describe non-stoichiometric compounds). (<i>Id.</i> at 28-29 (citing D.I. 203 , ex. Q at para. 22)) But that just further begged the question: What would Plaintiff's expert respond to that assertion? The Court does not know. And the Court remains uncertain as to what is the right path here, in light of this battle of the experts. In fact, the Court may need to hear from the experts live in order to reach the right answer; and (3) In light of this uncertainty, the Court will not adopt a construction of term 3 at this time. After further meeting and conferring, if the parties believe that a material dispute still remains as to this term and the term requires construction, then by no later than 21 days prior to the summary judgment motion filing deadline, the parties should advise the Court of this. The parties should also then let the Court know whether term 3 is expected to be relevant to any issues that will be raised in the forthcoming summary judgment briefing. Thereafter, if needed, the Court will set out a further process for resolving any remaining claim construction disputes regarding the term. Ordered by Judge Christopher J. Burke on 12/11/2024. (smg) (Entered: 12/11/2024)
12/12/2024	246	NOTICE OF SERVICE of Plaintiff Inpria Corporation's Notice of Deposition of Defendant Lam Research Corporation Pursuant to Federal Rule of Civil Procedure 30(b)(6) and Directed to Document Production filed by Inpria Corporation.(Poff, Adam) (Entered: 12/12/2024)
12/12/2024	247	Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Request for Discovery Teleconference. (Poff, Adam) (Entered: 12/12/2024)
12/13/2024	248	ORAL ORDER: The Court, having reviewed the parties' December 12, 2024 letter regarding Plaintiff's two discovery disputes, (D.I. 247), hereby ORDERS as follows: (1) By December 20, 2024, the parties shall jointly file a Motion to Resolve Discovery Dispute.; (2) By December 20, 2024, Plaintiff shall file with the Court a letter, not to exceed two (2) single-spaced pages, in no less than 12-point font, outlining the issues in dispute and its position on those issues.; (3) By December 31, 2024, Defendant shall file a letter, not to exceed two (2) single-spaced pages, in no less than 12-point font, outlining that party's reasons for its opposition.; (4) By January 7, 2025, Plaintiff shall file with the Court a reply letter brief, not to exceed one (1) single-spaced page, in no less than 12-point font.; (6) The parties should also consult and follow Judge Burke's "Guidelines for Discovery Disputes," which is found in the "Guidelines" tab on Judge Burke's portion of the District Court's website.; and (5) The Court will plan to resolve the disputes on the papers, unless: (a) it determines after reviewing the briefing that oral argument is needed; or (b) any party advises the Court in advance that, were argument to be set, a newer attorney will argue the dispute(s); see Standing Order Regarding Courtroom Opportunities for Newer Attorneys, https://www.ded.uscourts.gov/sites/ded/files/StandingOrder2017.pdf . If either of those circumstances, occurs, then the Court will schedule oral argument on the dispute(s) in the future. Ordered by Judge Christopher J. Burke on 12/13/2024. (smg) (Entered: 12/13/2024)
12/13/2024	249	Joint STATUS REPORT by Inpria Corporation. (Poff, Adam) (Entered: 12/13/2024)
12/18/2024	250	NOTICE OF SERVICE of Plaintiff Inpria Corporation's Amended Notice of Deposition of Defendant Lam Research Corporation Pursuant to Federal Rule of Civil Procedure 30(b)(6) and Directed to Document Production filed by Inpria Corporation.(Poff, Adam) (Entered: 12/18/2024)
12/20/2024	251	Joint MOTION to Resolve Discovery Dispute re 248 Oral Order - filed by Inpria Corporation. (Poff, Adam) Modified on 12/26/2024 (smg). (Entered: 12/20/2024)
12/20/2024	252	[SEALED] Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Plaintiff Inpria Corporation's Letter Brief Requesting Defendant Lam Research Corporation Revise Search Terms to Include Its Precursor Names and Substantially Complete Document Production by a Date Certain - re 251 Joint MOTION to Resolve Discovery Dispute re 248 Oral Order . (Attachments: # 1 Exhibit A - N, # 2 Text of Proposed Order)(Poff, Adam) Modified on 12/26/2024 (smg). (Entered: 12/20/2024)
12/20/2024	253	NOTICE OF SERVICE of Lam Research Corp.'s First Supplemental Responses and Objections to Inpria Corporation's Fourth Set of Interrogatories (No. 17) filed by Lam Research Corp..(Gorman, John) (Entered: 12/20/2024)
12/20/2024	254	NOTICE OF SERVICE of Lam Research Corp.'s First Amended Responses and Objections to Inpria Corporation's Fourth Set of Requests for Production (Nos. 79-81) filed by Lam Research Corp..(Gorman, John) (Entered: 12/20/2024)
12/20/2024	255	NOTICE OF SERVICE of Lam Research Corp.'s Responses and Objections to Inpria Corporation's Fifth Set of Requests for Production (Nos. 82-131) filed by Lam Research Corp..(Gorman, John) (Entered: 12/20/2024)
12/27/2024	256	STIPULATION TO EXTEND TIME for Plaintiff Inpria Corporation to file a public version of Plaintiff Inpria Corporation's Letter Brief Requesting Defendant Lam Research Corporation Revise Search Terms to Include its Precursor Names and Substantially Complete Document Production by a Date Certain (D.I. 252) to January 3, 2025 - filed by Inpria Corporation. (Vrana, Robert) (Entered: 12/27/2024)
12/27/2024		SO ORDERED, D.I. 256 STIPULATION TO EXTEND TIME for Plaintiff Inpria Corporation to file a public version of Plaintiff Inpria Corporation's Letter Brief Requesting Defendant Lam Research Corporation Revise Search Terms to Include its Precursor Names and Substantially Complete Document Production by a Date Certain (D.I. 252) to January 3, 2025 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 12/27/2024. (smg) (Entered: 12/27/2024)

12/31/2024	257	[SEALED] Letter to The Honorable Christopher J. Burke from John V. Gorman regarding Defendant's Letter Brief in Answer to Plaintiff's Letter Brief Requesting Defendant Revise Search Terms to Include its Precursor Names and Substantially Complete Document Production by a Date Certain - re 252 Letter,. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2)(Gorman, John) (Entered: 12/31/2024)
01/03/2025	258	REDACTED VERSION of 252 Letter, by Inpria Corporation. (Poff, Adam) (Entered: 01/03/2025)
01/07/2025	259	NOTICE OF SERVICE of Inpria Corporations Notice of Subpoena to Gelest, Inc. filed by Inpria Corporation.(Mackrides, Daniel) (Entered: 01/07/2025)
01/07/2025	260	REDACTED VERSION of 257 Letter, by Lam Research Corp.. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2)(Gorman, John) (Entered: 01/07/2025)
01/07/2025	261	[SEALED] Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Reply Requesting Lam Research Corporation Revise Search Terms - re 251 Joint MOTION to Resolve Discovery Dispute re 248 Oral Order , 252 Letter,. (Attachments: # 1 Exhibit O - Q)(Poff, Adam) Modified on 1/13/2025 (smg). (Entered: 01/07/2025)
01/08/2025	262	REQUEST for Oral Argument by Inpria Corporation re 251 Joint MOTION to Resolve Discovery Dispute re 248 Oral Order . (Poff, Adam) Modified on 1/11/2025 (smg). (Entered: 01/08/2025)
01/08/2025	263	NOTICE OF SERVICE of Notice of Subpoena to Produce Documents, Electronically Stored Information, and Things to Andrew Grenville filed by Lam Research Corp..(Gorman, John) (Entered: 01/08/2025)
01/09/2025	264	NOTICE OF SERVICE of Lam Research Corp.'s Third Set of Interrogatories (Nos. 15-22) and Third Set of Requests for Production (Nos. 57-65) filed by Lam Research Corp..(Gorman, John) (Entered: 01/09/2025)
01/10/2025	265	NOTICE OF SERVICE of Inpria Corporation's Amended Notice of Subpoena to Gelest, Inc filed by Inpria Corporation.(Mackrides, Daniel) (Entered: 01/10/2025)
01/14/2025	266	REDACTED VERSION of 261 Letter, by Inpria Corporation. (Attachments: # 1 Exhibit O - Q)(Poff, Adam) (Entered: 01/14/2025)
01/16/2025	267	Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding request for status conference. (Poff, Adam) (Entered: 01/16/2025)
01/16/2025	268	NOTICE OF SERVICE of Plaintiff Inpria Corporation's Amended Notice of Deposition of David Trussell Pursuant to Federal Rule of Civil Procedure 30(b)(6) and Directed to Document Production filed by Inpria Corporation.(Poff, Adam) (Entered: 01/16/2025)
01/17/2025	269	ORAL ORDER: The Court, having reviewed Plaintiff's January 16, 2025 letter, (D.I. 267), hereby ORDERS that a status teleconference is hereby set for January 27, 2025 at 10:00 a.m. By no later than January 22, 2025, the parties shall provide the Court's Courtroom Deputy, Ms. Grimes, with the names and e-mail addresses of all individuals who will participate in the teleconference and a dial-in number for the call via e-mail. Ordered by Judge Christopher J. Burke on 01/17/2025. (smg) (Entered: 01/17/2025)
01/21/2025	270	NOTICE OF SERVICE of Lam Research Corp.'s Third Supplemental Responses and Objections to Inpria Corporation's Second Set of Interrogatories (Nos. 4-13) and Lam Research Corp.'s First Supplemental Responses and Objections to Inpria Corporation's Third Set of Interrogatories (Nos. 14-16) filed by Lam Research Corp..(Barillare, Jody) (Entered: 01/21/2025)
01/27/2025		Minute Entry for proceedings held before Judge Christopher J. Burke - Status Teleconference held on January 27, 2025. The Court provided guidance regarding how to proceed with discovery. By no later than February 3, 2025, the parties shall meet and confer and submit to the Court a letter explaining any amendments to the scheduling order and related stipulations. The transcript shall serve as the Court's Order. Appearances: A. Poff, R. Vrana, P. Citroen, N. Modi, E. Dittmann, I. Askkenazi, B. Wilner and S. Taniguchi for Plaintiff; J. Gorman, M. Lyons, A. Hsu-Hoffman, K. Hora Jacobson and K. Fowler for Defendant. (Clerk: E. Rose; Court reporter: Heather Triozzi) (smg) (Entered: 01/28/2025)
01/31/2025	271	NOTICE OF SERVICE of Plaintiff Inpria Corporation's Final Infringement Contentions and Identification of Accused Products filed by Inpria Corporation.(Vrana, Robert) (Entered: 01/31/2025)
02/03/2025	272	STIPULATION TO EXTEND TIME for the parties to file a joint letter explaining any amendments to the scheduling order and related stipulations to February 7, 2025 - filed by Inpria Corporation. (Poff, Adam) (Entered: 02/03/2025)
02/03/2025		SO ORDERED, D.I. 272 STIPULATION TO EXTEND TIME for the parties to file a joint letter explaining any amendments to the scheduling order and related stipulations to February 7, 2025 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 02/03/2025. (smg) (Entered: 02/03/2025)
02/05/2025	273	NOTICE OF SERVICE of 1) Inpria's Fifth Set of Interrogatories to Lam (Nos. 1826); and 2) Inpria's Sixth Set of Requests for Production of Documents and Things to Lam (Nos. 132-151) filed by Inpria Corporation.(Vrana, Robert) (Entered: 02/05/2025)
02/07/2025	274	Joint Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Request for Discovery Teleconference. (Poff, Adam) (Entered: 02/07/2025)
02/07/2025	275	STIPULATION TO EXTEND TIME for the parties to file a joint letter explaining any amendments to the scheduling order and related stipulations to February 12, 2025, and to extend the deadline for Lam Research Corp. to provide its final invalidity contentions to February 14, 2025. - filed by Inpria Corporation. (Poff, Adam) (Entered: 02/07/2025)
02/10/2025	276	ORAL ORDER: The Court, having reviewed the parties' February 7, 2025 letter regarding Plaintiff's discovery dispute, (D.I. 274), hereby ORDERS as follows: (1) By February 14, 2025, the parties shall jointly file a Motion to Resolve Discovery Dispute.; (2) By February 14, 2025, Plaintiff shall file with the Court a letter, not to exceed two (2) single-spaced pages, in no less than 12-point font, outlining the issues in dispute and its position on those issues.; (3) By February 20, 2025, Defendant shall file a letter, not to exceed two (2) single-spaced pages, in no less than 12-point font, outlining the reasons for its opposition.; (4) By February 25, 2025, Plaintiff shall file with the Court a reply letter brief, not to exceed one (1) single-spaced page, in no less than 12-point font.; (5) The parties should also consult and follow Judge Burke's "Guidelines for Discovery Disputes," which is found in the "Guidelines" tab on Judge Burke's portion of the District Court's website.; and (6) The Court will plan to resolve the disputes on the papers, unless: (a) it determines after reviewing the briefing that oral argument is needed; or (b) any party advises the Court in advance that, were argument to be set, a newer attorney will argue the dispute(s)., see Standing Order Regarding Courtroom Opportunities for Newer Attorneys, https://www.ded.uscourts.gov/sites/ded/files/StandingOrder2017.pdf . If either of those circumstances, occurs, then the Court will schedule oral argument on the dispute(s) in the future. Ordered by Judge Christopher J. Burke on 02/10/2025. (smg) (Entered: 02/10/2025)
02/12/2025	277	STIPULATION TO EXTEND TIME for the parties to file a joint letter explaining any amendments to the scheduling order and related stipulations to February 13, 2025 - filed by Inpria Corporation. (Poff, Adam) (Entered: 02/12/2025)
02/12/2025	278	NOTICE OF SERVICE of 1) Plaintiff's Objections and Responses to Defendant's Third Set of Requests for Production (Nos. 57 - 65); and 2) Plaintiff's Objections and Responses to Defendant's Third Set of Interrogatories to Inpria (Nos. 15 - 22) filed by Inpria Corporation.(Vrana, Robert) (Entered: 02/12/2025)
02/13/2025	279	NOTICE OF SERVICE of notice of its intent to serve subpoena (Notice of Subpoena to Produce Documents, Electronically Stored Information, and Things to Douglas Keszler) filed by Lam Research Corp..(Gorman, John) (Entered: 02/13/2025)
02/13/2025	280	Joint Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Amendments to the Scheduling Order and Related Stipulations - re Status Conference,.. (Poff, Adam) (Entered: 02/13/2025)
02/13/2025	281	NOTICE OF SERVICE of notice of its intent to serve subpoena (Notice of Subpoena to Produce Documents, Electronically Stored Information, and Things to Entegris, Inc.) filed by Lam Research Corp..(Gorman, John) (Entered: 02/13/2025)
02/14/2025	282	STIPULATION and [Proposed] Order Amending Deadlines to the Scheduling Order and Related Stipulations by Inpria Corporation. (Poff, Adam) (Entered: 02/14/2025)
02/14/2025		SO ORDERED, D.I. 275 STIPULATION TO EXTEND TIME for the parties to file a joint letter explaining any amendments to the scheduling order and related stipulations to February 12, 2025, and to extend the deadline for Lam Research Corp. to provide its final invalidity contentions to February 14, 2025 filed by Inpria Corporation, and D.I. 277 STIPULATION TO EXTEND TIME for the parties to file a joint letter explaining any amendments to the scheduling order and related stipulations to February 13, 2025 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 02/14/2025. (smg) (Entered: 02/14/2025)
02/14/2025	283	Joint MOTION to Resolve Discovery Dispute re 276 Oral Order - filed by Inpria Corporation. (Vrana, Robert) Modified on 2/19/2025 (smg). (Entered: 02/14/2025)
02/14/2025	284	[SEALED] Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Request that Defendant Lam Research Corporation Produce Notes Used by David Trussell During Deposition - re 283 Joint MOTION to Resolve Discovery Dispute re 276 Oral Order. (Attachments: # 1 Exhibit A - H)(Poff, Adam) Modified on 2/19/2025 (smg). (Entered: 02/14/2025)
02/14/2025	285	NOTICE of Lodging in Multimedia Format by Inpria Corporation re 284 Letter, (Poff, Adam) (Entered: 02/14/2025)
02/19/2025		SO ORDERED, D.I. 282 Stipulation and Order Amending Deadlines to the Scheduling Order and Related Stipulations filed by Inpria Corporation. (Fact Discovery completed by 4/4/2025, Opening Expert Reports due by 4/21/2025, Rebuttal Expert Reports due by 5/16/2025, Reply Expert Reports due by 6/4/2025, Expert Discovery due by 7/2/2025.) Ordered by Judge Christopher J. Burke on 02/19/2025. (smg) (Entered: 02/19/2025)
02/19/2025	286	MULTI MEDIA DOCUMENT filed by Inpria Corporation in the form of 2 USB Drives. Filing related to D.I. 285 Notice of Lodging. (Media on file in chambers). (smg) (Entered: 02/19/2025)
02/19/2025	287	ORAL ORDER: The Court has reviewed the portion of the parties' February 13, 2025 joint letter that addresses a possible motion for preliminary injunction ("PI motion"). (D.I. 280 at 5-7) As an initial matter, the Court tends to agree with Defendant that this is an unusual procedural posture for Plaintiff to be seeking a preliminary injunction (and, relatedly, to be requiring the use of the significant amount of court resources that are implicated by the filing of a PI motion). That is because this patent case has been pending for two years and four months, and as a result, the patentee is currently set to go to trial less than 10 months from now. That said, the Court is not privy to all of the relevant information that might relate to whether Plaintiff would in fact face the prospect of imminent irreparable harm, were its infringement allegations not adjudicated until the December 2025 trial. And so, the Court is in no position to preclude the filing of a PI motion. Therefore, if after further reflection Plaintiff still intends to file a PI motion, then the Court hereby provides the following guidance to the parties about that process: (1) If a PI motion is filed, Plaintiff will be permitted to address therein no more than four (4) asserted claims in total.; and (2) The briefing on any such PI motion will be as follows: (a) Plaintiff's opening brief and Defendant's answering brief shall not exceed twenty-five (25) pages, respectively, and Plaintiff's reply brief will not exceed twelve (12) pages.; (b) The answering brief will be due 21 days after the opening brief, and the reply brief will be due 10 days after the answering brief.; (c) The opening brief will be due to be filed on a date certain (along with the filing of the PI motion itself); the opening brief's filing date will not be contingent on the Court issuing a claim construction order as to certain currently unconstrued claim terms.; and (d) If by the time of briefing, certain claim terms are not construed that have relevance to the parties' arguments regarding the PI motion, then the parties should simply say in their briefing what they think the relevant term's construction should be and why. Additionally, in light of Defendant's comments, (<i>id.</i> at 7), the Court believes that the parties should meet and confer verbally once more in order to further discuss details relating to any forthcoming PI motion. By no later than February 24, 2025, the parties shall meet and confer regarding at least the following topics: (1) whether (assuming Plaintiff still intends to file a PI motion), they can agree on dates for a briefing schedule and a hearing, in line with the guidance the Court has provided above.; (2) the nature of the claims and defenses that will likely be addressed in the briefing and at the hearing (e.g., what asserted claims will Plaintiff likely put at issue, what infringement issues will likely be at play as to those claims, what are the key defenses Defendant likely will press on the merits); (3) the nature of the injunctive relief Plaintiff will be seeking; (4) specifics about what type of early summary judgment motion regarding a license defense Defendant wishes to file, and whether such a motion should be permitted along with the filing of the PI motion; and (5) specifics about Plaintiff's assertion as to why imminent irreparable harm will befall it if a PI motion is not adjudicated prior to trial (and Defendant's response to that argument). After the meet and confer, and by no later than February 24, 2025, the parties shall file a joint letter of no more than four (4) single-spaced pages that summarizes their discussion of the above-referenced topics (including whether any agreements were reached on a proposed schedule). After receiving the letter, if appropriate, the Court will set a PI motion briefing schedule and hearing date, will determine whether Defendant shall be permitted to file an early summary judgment motion and will address any other relevant details regarding this matter. Ordered by Judge Christopher J. Burke on 02/19/2025. (smg) (Entered: 02/19/2025)

02/20/2025	288	NOTICE OF SERVICE of Defendant's Final Invalidity Contentions and Exhibits filed by Lam Research Corp..(Gorman, John) (Entered: 02/20/2025)
02/20/2025	289	[SEALED] Letter to The Honorable Christopher J. Burke from Amy M. Dudash regarding Defendant Lam Research Corp.'s Letter Brief in Opposition to Plaintiff Inpria Corp.'s Request for David Trussell's Notes - re 284 Letter,. (Attachments: # 1 Exhibits 1 to 6)(Dudash, Amy) (Entered: 02/20/2025)
02/21/2025	290	NOTICE of Lodging in Multimedia Format by Lam Research Corp. re 289 Letter, (Dudash, Amy) (Entered: 02/21/2025)
02/21/2025	291	MOTION for Pro Hac Vice Appearance of Attorney Amanda S. Williamson and Zachary D. Miller - filed by Lam Research Corp.. (Attachments: # 1 Certification of Amanda S. Williamson, # 2 Certification of Zachary D. Miller)(Dudash, Amy) (Entered: 02/21/2025)
02/21/2025	292	Pro Hac Vice Fee - Credit Card Payment received for Amanda S. Williamson and Zachary D. Miller. (re 291 MOTION for Pro Hac Vice Appearance of Attorney Amanda S. Williamson and Zachary D. Miller)(Payment of \$ 100, receipt number ADEDC-4620284).(Dudash, Amy) (Entered: 02/21/2025)
02/24/2025		SO ORDERED, D.I. 291 MOTION for Pro Hac Vice Appearance of Attorney Amanda S. Williamson and Zachary D. Miller filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 02/24/2025. (sam) (Entered: 02/24/2025)
02/24/2025		Pro Hac Vice Attorney Amanda S. Williamson,Zachary D. Miller for Lam Research Corp. added for electronic noticing. Pursuant to Local Rule 83.5 (d)., Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (scs) (Entered: 02/24/2025)
02/24/2025	293	REDACTED VERSION of 284 Letter, by Inpria Corporation. (Attachments: # 1 Exhibit A - H)(Poff, Adam) (Entered: 02/24/2025)
02/24/2025	295	MULTI MEDIA DOCUMENT filed by Lam Research Corp. in the form of 2 USB Drives. Filing related to D.I. 290 Notice of Lodging. (Media on file in Clerk's Office). (sam) (Entered: 02/25/2025)
02/25/2025	294	STIPULATION TO EXTEND TIME for Parties to Submit Joint Letter in Response to the Court's February 19, 2025 Oral Order (D.I. 287) to February 25, 2025 - filed by Lam Research Corp.. (Dudash, Amy) (Entered: 02/25/2025)
02/25/2025		SO ORDERED, D.I. 294 STIPULATION TO EXTEND TIME for Parties to Submit Joint Letter in Response to the Court's February 19, 2025 Oral Order (D.I. 287) to February 25, 2025 filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 02/25/2025. (sam) (Entered: 02/25/2025)
02/25/2025	296	Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Reply Requesting Lam Produce Notes Used by David Trussell - re 284 Letter, 283 Joint MOTION to Resolve Discovery Dispute re 276 Oral Order. (Poff, Adam) Modified on 2/27/2025 (sam). (Entered: 02/25/2025)
02/25/2025	297	[SEALED] Joint Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Response to the Court's Oral Order - re 287 Oral Order. (Attachments: # 1 Exhibit A - H)(Poff, Adam) Modified on 2/27/2025 (sam). (Entered: 02/25/2025)
02/27/2025	298	REDACTED VERSION of 289 Letter, by Lam Research Corp.. (Dudash, Amy) (Entered: 02/27/2025)
02/27/2025	299	NOTICE OF SERVICE of Notice of Intent to Serve Subpoena for Deposition to Entegris, Inc. filed by Lam Research Corp..(Dudash, Amy) (Entered: 02/27/2025)
02/27/2025	300	NOTICE OF SERVICE of Notice of Intent to Serve Subpoena to Produce Documents, Electronically Stored Information, and Things to ProQuest LLC filed by Lam Research Corp..(Dudash, Amy) (Entered: 02/27/2025)
02/28/2025	301	Joint Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Request for Discovery Teleconference. (Poff, Adam) (Entered: 02/28/2025)
02/28/2025	302	ORAL ORDER: The Court, having reviewed the parties' February 28, 2025 joint letter, (D.I. 301), hereby notes and ORDERS the following: (1) This letter is the fifth time the parties have sought the Court's assistance in resolving discovery disputes (15 disputes in total, some of which they later resolved on their own via Court-ordered further meeting and conferring)—in addition to the many other disputed issues the parties have raised for the Court in this case. (See D.I. 118 ; D.I. 120 ; D.I. 128 ; D.I. 228 ; D.I. 251 ; D.I. 283); (2) As it has previously noted, (D.I. 120), the Court has an interest in ensuring that the parties have really made a strong effort to meet and confer and attempt to resolve their disputes before bringing them to the Court, and the sheer number of discovery disputes raised in the last few months causes the Court to worry that this may not be happening.; (3) In light of this, the Court hereby ORDERS that counsel (including at least one Delaware counsel per side, the outside counsel who has the greatest familiarity with the disputes, and each side's lead trial counsel) shall participate in one further verbal meet and confer in order to discuss whether any of these issues can be resolved.; and (4) By no later than March 7, 2025, the parties shall file a letter of no more than one single-spaced page, indicating whether they have been able to resolve or table either of the two listed disputes, and which disputes (if any) remain to be resolved by the Court. Ordered by Judge Christopher J. Burke on 02/28/2025. (sam) (Entered: 02/28/2025)
03/01/2025	303	MOTION for Pro Hac Vice Appearance of Attorney Matthew J. Moore, Charles H. Sanders, Thomas W. Yeh, and Robert B. Dunteman - filed by Lam Research Corp.. (Attachments: # 1 Certification of Matthew J. Moore, # 2 Certification of Charles H. Sanders, # 3 Certification of Thomas W. Yeh, # 4 Certification of Robert B. Dunteman)(Dudash, Amy) (Entered: 03/01/2025)
03/01/2025	304	Pro Hac Vice Fee - Credit Card Payment received for Matthew J. Moore, Charles H. Sanders, Thomas W. Yeh, and Robert B. Dunteman. (re 303 MOTION for Pro Hac Vice Appearance of Attorney Matthew J. Moore, Charles H. Sanders, Thomas W. Yeh, and Robert B. Dunteman)(Payment of \$ 200, receipt number ADEDC-4626105).(Dudash, Amy) (Entered: 03/01/2025)
03/01/2025	305	MOTION for Pro Hac Vice Appearance of Attorney Dion M. Bregman - filed by Lam Research Corp.. (Attachments: # 1 Certification of Dion M. Bregman)(Dudash, Amy) (Entered: 03/01/2025)
03/01/2025	306	Pro Hac Vice Fee - Credit Card Payment received for Dion M. Bregman. (re 305 MOTION for Pro Hac Vice Appearance of Attorney Dion M. Bregman)(Payment of \$ 50, receipt number ADEDC-4626107).(Dudash, Amy) (Entered: 03/01/2025)
03/03/2025		SO ORDERED, D.I. 305 MOTION for Pro Hac Vice Appearance of Attorney Dion M. Bregman filed by Lam Research Corp. and D.I. 303 MOTION for Pro Hac Vice Appearance of Attorney Matthew J. Moore, Charles H. Sanders, Thomas W. Yeh, and Robert B. Dunteman filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 03/03/2025. (sam) (Entered: 03/03/2025)
03/03/2025	307	ORAL ORDER: The Court, having reviewed the parties' February 25, 2025 joint letter regarding Plaintiff's forthcoming motion for preliminary injunction ("PI Motion"), (D.I. 297), hereby ORDERS as follows: (1) The Court ADOPTS the parties' proposed briefing schedule for the PI Motion. (D.I. 297 at 1) The schedule is as follows: (a) By no later than March 10, 2025, Plaintiff shall file with the Court its PI Motion and opening brief, not to exceed twenty-five (25) pages. With its motion, Plaintiff is permitted to address no more than four (4) asserted claims in total.; (b) By no later than March 31, 2025, Defendant shall file with the Court its answering brief, not to exceed twenty-five (25) pages.; and (c) By no later than April 10, 2025, Plaintiff shall file with the Court its reply brief, not to exceed twelve (12) pages.; (2) The preliminary injunction hearing will be held before Judge Christopher J. Burke in Courtroom 2A on April 25, 2025 beginning at 9:00 a.m.; (3) For the reasons set out by Plaintiff in the letter, (<i>id.</i> at 3), and in light of the Court's need to conserve its resources, the Court DENIES Defendant's request to file an early summary judgment motion along with the PI Motion.; and (4) The Court encourages both sides to strongly consider further narrowing (if possible) the scope and amount of the merits-based infringement/invalidity arguments they intend to put into play as to the Motion (i.e., to focus only on their "best" and most impactful arguments in the briefing). Ordered by Judge Christopher J. Burke on 03/03/2025. (sam) (Entered: 03/03/2025)
03/03/2025		Pro Hac Vice Attorney Charles H. Sanders, Robert B. Dunteman, Dion M. Bregman, Thomas W. Yeh, Matthew J. Moore for Lam Research Corp. added for electronic noticing. Pursuant to Local Rule 83.5 (d)., Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (cdd) (Entered: 03/03/2025)
03/04/2025	308	STIPULATION TO EXTEND TIME for the parties to file the public version of their joint letter responding to the Court's February 19, 2025 Oral Order to March 5, 2025 - filed by Inpria Corporation. (Poff, Adam) (Entered: 03/04/2025)
03/05/2025		SO ORDERED, D.I. 308 STIPULATION TO EXTEND TIME for the parties to file the public version of their joint letter responding to the Court's February 19, 2025 Oral Order to March 5, 2025 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 03/05/2025. (sam) (Entered: 03/05/2025)
03/05/2025	309	REDACTED VERSION of 297 Letter by Inpria Corporation. (Attachments: # 1 Exhibit A - H)(Poff, Adam) (Entered: 03/05/2025)
03/05/2025	310	ORAL ORDER: The Court, having reviewed Plaintiff's discovery dispute motion ("Motion"), (D.I. 228), which would require Defendant to (1) run certain disputed search terms (the "Disputed Search Terms") and (2) search the ESI for numerous additional custodians, as well as the briefing related thereto, (D.I. 229 ; D.I. 234 ; D.I. 240), hereby ORDERS as follows: (1) With respect to the Disputed Search Terms, Plaintiff's request is DENIED. It is not just that the terms are said to generate approximately 1 million additional documents that would need to be reviewed. (D.I. 234 at 1-2; <i>id.</i> , ex. AI); <i>see also Biogen Inc. v. Sandoz Inc.</i> , Civil Action No. 22-1190-GBW, D.I. 364 (D. Del. June 17, 2024) (holding that "proposed search terms[,] which yield tens of thousands of hits[,] were overbroad). Or that Defendant says that the cost to review those documents will be between \$1.85 and \$2.5 million (an argument that would have been even stronger had it been accompanied by a sworn declaration). (D.I. 234 at 1); <i>see also</i> "Guidelines for Discovery Disputes" at para. 7 (found in the "Guidelines" tab on Judge Burke's portion of the District Court's website, and cited in the Court's November 7, 2024 Oral Order); <i>State Farm Mut. Auto. Ins. Co. v. Amazon.com, Inc.</i> , Civil Action No. 22-1447-CJB, D.I. 146 (D. Del. Feb. 15, 2024). It is that one can tell from just looking at the Disputed Search Terms that they are really overbroad in their scope—such that they violate the Delaware Default Standard's requirement that "[f]ocused terms" must be used for ESI searching. District of Delaware Default Standard for Discovery, Including Discovery of Electronically Stored Information ("ESI") (hereafter, "Default Standard") at para. 5(b). Although the terms at issue do use a conjunctive connector (like "AND" or "w/2"), on either side of those connectors are long parentheticals filled with an innumerable number of "OR" connectors—for example, as many as 34 different "OR" connectors are used in the first disputed term alone (resulting in what is said to be a possible 285 different combinations). (D.I. 234 at 1) This type of indiscriminate searching simply cannot be termed sufficiently "focused" for the Default Standard's purposes. And with all of those "ORs" being used, at some point it simply isn't fair to consider such a term to be "one" search term at all. <i>Cf. In re Google Litig.</i> , No. C 08-03172 RMW (PSG), 2011 WL 6113000, at *3 (N.D. Cal. Dec. 7, 2011); (2) With respect to the additional ESI custodian issue, the request is also DENIED. Paragraph 3(a) of the Default Standard provides for a default number of 10 custodians whose ESI Defendant must search; Defendant has identified those 10 people (a diverse array of contributors in its executive, technical, marketing, and engineering spaces, some of whom supervise a number of the additional custodians that are at issue here). (See D.I. 239 , ex. AD; D.I. 234 at 3); <i>see also</i> Default Standard at paras. 3(a), 5(b). If Plaintiff wishes that additional Defendant custodians' information should be searched, it has the burden to "show good cause as to why more [custodians] should be required." <i>United States v. Gilead Scis., Inc.</i> , Civil Action No. 19-2103-MN-CJB, D.I. 247 (D. Del. Dec. 21, 2021). Plaintiff has submitted a 15-page list relating to what apparently totals out to a request for 50 additional custodians—an incredibly large number to be requested at one time, at least in the Court's experience in this District as to competitor patent cases. (D.I. 230 , ex. B & J) A winning request here would be focused—one targeted to an additional, <i>cabined</i> number of persons, that makes a <i>detailed</i> showing, in a <i>nuanced, person-specific</i> manner, as to why that person is likely to have not just relevant but also <i>non-cumulative</i> information (as compared to the information in the possession of the 10 custodians initially selected by the other side). <i>See State Farm Mut. Auto. Ins. Co.</i> , D.I. 146 (assessing, in a large competitor patent case, the plaintiff's request that the defendant—who had agreed to search for ESI from 12 custodians (a number later reduced to 9 after certain of those employees left the company)—should be required to search the ESI of four additional persons—and doing so by investigating specific arguments about those four new custodians, and the extent to which they would have duplicative information to the others already on defendant's list). But Plaintiff's request is not that. Instead, Plaintiff has simply included 15 pages of charts listing 50 people, and pointing therein (at a high level) to the proposed custodians' job titles, or to the fact that they were referenced in discovery documents. (D.I. 231 , ex. B; <i>see also</i> D.I. 234 at 3); and (3) If in the future, Plaintiff can make a more focused showing as to additional search terms to be run or custodians to be searched, it may re-raise those issue with Defendant (and with the Court if necessary). Ordered by Judge Christopher J. Burke on 03/05/2025. (sam) (Entered: 03/05/2025)
03/06/2025	311	NOTICE OF SERVICE of Lam Research Corp.'s Fourth Set of Interrogatories (Nos. 23-25) filed by Lam Research Corp..(Dudash, Amy) (Entered: 03/06/2025)
03/06/2025	312	NOTICE OF SERVICE of 1) Inpria's First Set of Requests for Admission to Lam (Nos. 150); 2) Inpria's Seventh Set of Requests for Production of Documents and Things to Lam (Nos. 152-155); and 3) Inpria's Sixth Set of Interrogatories to Lam (Nos. 2730). filed by Inpria Corporation.(Poff, Adam) (Entered: 03/06/2025)
03/07/2025	313	Joint Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Response to Oral Order (D.I. 302) - re 302 Oral Order. (Poff, Adam) Modified on 3/10/2025 (sam). (Entered: 03/07/2025)

03/10/2025	314	ORAL ORDER: The Court, having reviewed the parties' March 7, 2025 letter, (D.I. 313), appreciates that the parties have been working to try to resolve some of their pending discovery disputes. In light of the content of the letter, the Court will DENY without prejudice to renew Plaintiff's discovery dispute motion at D.I. 251 , as it appears that the parties are continuing to meet and confer regarding that motion, and that if any portion of it remains live after this work, the scope of any request for relief may be different than what is described in the current briefing. The parties have indicated that they will advise the Court if they are unable to reach agreement on those issues, (<i>id.</i> at 1); if they do, the Court will provide further guidance at that point. With regard to discovery dispute # 2 in the parties' February 28, 2025 letter (the only dispute listed in that letter that is currently ready for resolution), the Court hereby ORDERS as follows: (1) By March 14, 2025, Defendant shall file a Motion To Resolve Discovery Dispute.; (2) By March 14, 2025 Defendant shall file with the Court a letter, not to exceed two (2) single-spaced pages, in no less than 12-point font, outlining the issue in dispute and its position on that issue.; (3) By March 20, 2025, Plaintiff may file a letter, not to exceed two (2) single-spaced pages, in no less than 12-point font, outlining the reasons for its opposition.; (4) By March 25, 2025, Defendant shall file with the Court a reply letter brief, not to exceed one (1) single-spaced page, in no less than 12-point font.; (5) The parties should also consult and follow Judge Burke's "Guidelines for Discovery Disputes," which is found in the "Guidelines" tab on Judge Burke's portion of the District Court's website.; and (6) The Court will plan to resolve the dispute on the papers, unless: (a) it determines after reviewing the briefing that oral argument is needed; or (b) any party advises the Court in advance that, were argument to be set, a newer attorney will argue the dispute(s), <i>see</i> Standing Order Regarding Courtroom Opportunities for Newer Attorneys, https://www.ded.uscourts.gov/sites/ded/files/StandingOrder2017.pdf . If either of those circumstances occurs, then the Court will schedule oral argument on the dispute(s) in the future. Ordered by Judge Christopher J. Burke on 03/10/2025. (sam) (Entered: 03/10/2025)
03/10/2025	315	MOTION for Preliminary Injunction - filed by Inpria Corporation. (Attachments: # 1 Rule 7.1.1 Certification, # 2 Text of Proposed Order)(Poff, Adam) (Main Document 315 replaced on 3/14/2025) (sam). (Attachment 2 replaced on 3/14/2025) (sam). (Entered: 03/10/2025)
03/10/2025	316	[SEALED] DECLARATION of Phillip Citroen re 315 MOTION for Preliminary Injunction <i>Volume 1 of 4 (Exhibits 1 - 50)</i> by Inpria Corporation. (Attachments: # 1 Exhibit 1 - 20, # 2 Exhibit 21 - 30, # 3 Exhibit 31 - 45, # 4 Exhibit 46 - 50)(Poff, Adam) (Entered: 03/10/2025)
03/10/2025	317	[SEALED] DECLARATION of Phillip Citroen re 315 MOTION for Preliminary Injunction <i>Volume 2 of 4 (Exhibits 51 - 100)</i> by Inpria Corporation. (Attachments: # 1 Exhibit 51 - 65, # 2 Exhibit 66 - 80, # 3 Exhibit 81 - 93, # 4 Exhibit 94 - 100)(Poff, Adam) (Entered: 03/10/2025)
03/10/2025	318	[SEALED] DECLARATION of Phillip Citroen re 315 MOTION for Preliminary Injunction <i>Volume 3 of 4 (Exhibits 101-160)</i> by Inpria Corporation. (Attachments: # 1 Exhibit 101 - 115, # 2 Exhibit 116 - 140, # 3 Exhibit 141 - 160)(Poff, Adam) (Entered: 03/10/2025)
03/10/2025	319	[SEALED] DECLARATION of Phillip Citroen re 315 MOTION for Preliminary Injunction <i>Volume 4 of 4 (Exhibits 161 - 222)</i> by Inpria Corporation. (Attachments: # 1 Exhibit 161 - 192, # 2 Exhibit 193 - 213, # 3 Exhibit 214 - 222)(Poff, Adam) (Entered: 03/10/2025)
03/10/2025	320	[SEALED] DECLARATION of Stephen Meyers re 315 MOTION for Preliminary Injunction by Inpria Corporation. (Poff, Adam) (Entered: 03/10/2025)
03/10/2025	321	[SEALED] DECLARATION of Mohan Rao, Ph.D. re 315 MOTION for Preliminary Injunction by Inpria Corporation. (Poff, Adam) (Entered: 03/10/2025)
03/10/2025	322	[SEALED] DECLARATION of Bruce W. Smith, Ph.D. re 315 MOTION for Preliminary Injunction by Inpria Corporation. (Poff, Adam) (Entered: 03/10/2025)
03/10/2025	323	[SEALED] OPENING BRIEF in Support re 315 MOTION for Preliminary Injunction filed by Inpria Corporation. Answering Brief/Response due date per Order is 3/31/2025. (Poff, Adam) Modified on 3/12/2025 (sam). (Entered: 03/10/2025)
03/11/2025	324	NOTICE of filing the following Non-Paper material(s) in multi media format: USB Flash Drive containing Sealed Exhibits 27, 29, 32 and 173, appended to the Declaration of Phillip Citroen [D.I. 316; D.I. 319]. Original Non-paper material(s) to be filed with the Clerk's Office. Notice filed by Adam Wyatt Poff on behalf of Inpria Corporation (Poff, Adam) (Entered: 03/11/2025)
03/11/2025	325	NOTICE OF SERVICE of Lam Research Corp.'s Responses and Objections to Inpria's Sixth Set of Requests for Production (Nos. 132-151) and Lam Research Corp.'s Responses and Objections to Inpria's Fifth Set of Interrogatories (Nos. 18-26) filed by Lam Research Corp..(Dudash, Amy) (Entered: 03/11/2025)
03/11/2025	326	MULTI MEDIA DOCUMENT filed by Inpria Corporation in the form of 2 USB Drives. Filing related to D.I. 324 Notice of Filing Multi Media Materials. (Media on file in Chambers.) (sam) (Entered: 03/11/2025)
03/12/2025		Set Briefing Schedule per D.I. 314 Oral Order: Re D.I. 315 MOTION for Preliminary Injunction . Answering Brief due 4/10/2025. (sam) (Entered: 03/12/2025)
03/14/2025		CORRECTING ENTRY: Main document and attachment 2 to D.I. 315 has been replaced per request of filing counsel to correct inconsistencies. (sam) (Entered: 03/14/2025)
03/14/2025	327	[SEALED] Letter to The Honorable Christopher J. Burke from Amy M. Dudash regarding Letter Brief in Support of Its Motion to Compel Production of JSR Corp. Acquisition Documents. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G, # 8 Exhibit I, # 9 Exhibit J)(Dudash, Amy) (Entered: 03/14/2025)
03/14/2025	328	NOTICE OF SERVICE of (1) Notice of its intent to serve Subpoena (Notice of Subpoena for deposition of Jeremy Anderson; (2) Notice of its intent to serve subpoena (Notice of Subpoena for deposition of James Passarelli; (3) Notice of its intent to serve subpoena (Notice of Subpoena for deposition of Ryan Del Re; (4) Notice of its intent to serve subpoena (Notice of Subpoena for deposition of Michael Murphy; and (5) Notice of its intent to serve subpoena (Notice of Subpoena for deposition of Miriam Sortland) filed by Lam Research Corp..(Dudash, Amy) (Entered: 03/14/2025)
03/14/2025	329	NOTICE OF SERVICE of 1. Notice of its intent to serve subpoena (Notice of Subpoena for deposition of Miles Wilklow-Marnell; 2. Notice of its intent to serve subpoena (Notice of subpoena for deposition of Robert Brainard; 3. Notice of its intent to serve subpoena (Notice of Subpoena for deposition of Daniel Freedman; 4. Notice of its intent to serve subpoena (Notice of Subpoena for deposition of RF SUNY; and 5. Notice of its intent to serve subpoena (Notice of Subpoena for deposition of OSU filed by Lam Research Corp..(Dudash, Amy) (Entered: 03/14/2025)
03/15/2025	330	Official Transcript of Motion to Stay held on 4/22/24 before Judge Christopher Burke. Court Reporter Deanna Warner, Email: deanna_warner@ded.uscourts.gov. Transcript may be viewed at the court public terminal or order/purchased through the Court Reporter before the deadline for Release of Transcript Restriction. After that date, it may be obtained through PACER. Redaction Request due 4/7/2025. Redacted Transcript Deadline set for 4/15/2025. Release of Transcript Restriction set for 6/13/2025. (Warner, Deanna) (Entered: 03/15/2025)
03/17/2025	331	MOTION for Extension of Time to file redactions to Inpria's Sealed PI Motion filings (D.I. 316-323) to March 20, 2025 - filed by Inpria Corporation. (Poff, Adam) (Entered: 03/17/2025)
03/18/2025		SO ORDERED, D.I. 331 MOTION for Extension of Time to file redactions to Inpria's Sealed PI Motion filings (D.I. 316-323) to March 20, 2025 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 03/18/2025. (sam) (Entered: 03/18/2025)
03/19/2025	332	NOTICE to Take Deposition of Samantha Tan on March 31, 2025 filed by Inpria Corporation.(Poff, Adam) (Entered: 03/19/2025)
03/19/2025	333	NOTICE to Take Deposition of Gary Bultman on March 28, 2025 filed by Inpria Corporation.(Poff, Adam) (Entered: 03/19/2025)
03/19/2025	334	NOTICE to Take Deposition of Tim Weidman on April 4, 2025 filed by Inpria Corporation.(Poff, Adam) (Entered: 03/19/2025)
03/19/2025	335	NOTICE to Take Deposition of Will Wu on April 2, 2025 filed by Inpria Corporation.(Poff, Adam) (Entered: 03/19/2025)
03/19/2025	336	NOTICE to Take Deposition of Anjua De Silva on March 25, 2025 filed by Inpria Corporation.(Poff, Adam) (Entered: 03/19/2025)
03/19/2025	337	NOTICE to Take Deposition of Benjamin Kam on March 24, 2025 filed by Inpria Corporation.(Poff, Adam) (Entered: 03/19/2025)
03/19/2025	338	NOTICE to Take Deposition of Pramod Subramonium on April 1, 2025 filed by Inpria Corporation.(Poff, Adam) (Entered: 03/19/2025)
03/19/2025	339	NOTICE to Take Deposition of Patrick Van Cleemput on April 3, 2025 filed by Inpria Corporation.(Poff, Adam) (Entered: 03/19/2025)
03/19/2025	340	NOTICE to Take Deposition of Richard Gottsoho on March 25, 2025 filed by Inpria Corporation.(Poff, Adam) (Entered: 03/19/2025)
03/20/2025	341	NOTICE to Take Deposition of Gary Bultman on March 28, 2025 filed by Inpria Corporation.(Poff, Adam) (Entered: 03/20/2025)
03/20/2025	342	NOTICE OF SERVICE of Notice of Deposition of Jason Stowers filed by Lam Research Corp..(Dudash, Amy) (Entered: 03/20/2025)
03/20/2025	343	NOTICE OF SERVICE of Notice of Deposition of Alan Telecky filed by Lam Research Corp..(Dudash, Amy) (Entered: 03/20/2025)
03/20/2025	344	NOTICE OF SERVICE of Notice of Deposition of Brian Cardineau filed by Lam Research Corp..(Dudash, Amy) (Entered: 03/20/2025)
03/20/2025	345	NOTICE OF SERVICE of Notice of Deposition of Joseph Edson filed by Lam Research Corp..(Dudash, Amy) (Entered: 03/20/2025)
03/20/2025	346	NOTICE OF SERVICE of Notice of Deposition of Kai Jiang filed by Lam Research Corp..(Dudash, Amy) (Entered: 03/20/2025)
03/20/2025	347	NOTICE OF SERVICE of Plaintiff Inpria Corporation's Notice of Deposition of Defendant Lam Research Corp. Pursuant to Federal Rule of Civil Procedure 30(b)(6) filed by Inpria Corporation.(Poff, Adam) (Entered: 03/20/2025)
03/20/2025	348	MOTION for Pro Hac Vice Appearance of Attorney Scott F. Peachman, Carl J. Minniti III, David Valente and Chinmay Bagwe - filed by Inpria Corporation. (Vrana, Robert) (Entered: 03/20/2025)
03/20/2025	349	Pro Hac Vice Fee - Credit Card Payment received for Scott F. Peachman, Carl J. Minniti III, David Valente, and Chinmay Bagwe. (re 348 MOTION for Pro Hac Vice Appearance of Attorney Scott F. Peachman, Carl J. Minniti III, David Valente and Chinmay Bagwe)(Payment of \$ 200, receipt number ADEDC-4641955).(Vrana, Robert) (Entered: 03/20/2025)
03/20/2025	350	STIPULATION TO EXTEND TIME for the parties to file public versions of all sealed preliminary injunction filings to April 17, 2025 - filed by Inpria Corporation. (Poff, Adam) (Entered: 03/20/2025)
03/20/2025	351	NOTICE of Appearance by Rodger Dallery Smith, II and Cameron P. Clark by Lam Research Corp. (Smith, Rodger) (Entered: 03/20/2025)
03/20/2025	352	[SEALED] Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Inpria's Opposition to Lam's Request for Production of Certain Documents in the Possession of Non-Party JSR Corp. - re 314 Order on Motion for Miscellaneous Relief. (Attachments: # 1 Exhibit 1 - 5)(Poff, Adam) Modified on 3/21/2025 (sam). (Entered: 03/20/2025)
03/20/2025		SO ORDERED, D.I. 350 STIPULATION TO EXTEND TIME for the parties to file public versions of all sealed preliminary injunction filings to April 17, 2025 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 03/20/2025. (sam) (Entered: 03/21/2025)
03/21/2025		CORRECTING ENTRY: D.I. 352 has been placed under seal per request of filing counsel. (sam) (Entered: 03/21/2025)
03/21/2025		SO ORDERED, D.I. 348 Motion to Appear Pro Hac Vice of Attorney Scott F. Peachman, Carl J. Minniti III, David Valente and Chinmay Bagwe - filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 03/21/2025. (sam) (Entered: 03/21/2025)
03/21/2025	353	NOTICE OF SERVICE of 1) Plaintiff's Third Supplemental Objections and Responses to Defendant's First Set of Interrogatories (Nos. 17); and 2) Plaintiff Inpria's Objections and Responses to Defendant Lam's Notice of Rule 30(b)(6) Deposition to Inpria filed by Inpria Corporation.(Poff, Adam) (Entered: 03/21/2025)

03/24/2025	354	MOTION for Pro Hac Vice Appearance of Attorney Yuqi Li, Ph.D. - filed by Lam Research Corp.. (Attachments: # 1 Certification of Yuqi Li, Ph.D.)(Dudash, Amy) (Entered: 03/24/2025)
03/24/2025	355	Pro Hac Vice Fee - Credit Card Payment received for Yuqi Li, Ph.D.. (re 354 MOTION for Pro Hac Vice Appearance of Attorney Yuqi Li, Ph.D.)(Payment of \$ 50, receipt number ADEDC-4643763).(Dudash, Amy) (Entered: 03/24/2025)
03/24/2025		SO ORDERED, D.I. 354 MOTION for Pro Hac Vice Appearance of Attorney Yuqi Li, Ph.D. - filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 03/24/2025. (sam) (Entered: 03/24/2025)
03/25/2025		Pro Hac Vice Attorney Yuqi Li, Ph.D. for Lam Research Corp. added for electronic noticing. Pursuant to Local Rule 83.5 (d)., Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (cdd) (Entered: 03/25/2025)
03/25/2025	356	[SEALED] Letter to The Honorable Christopher J. Burke from Rodger D. Smith II regarding Reply in Support of Motion to Compel Production of JSR Corp. Acquisition Documents (D.I. 327) - re 327 Letter., (Attachments: # 1 Exhibits K-N)(Smith, Rodger) (Entered: 03/25/2025)
03/26/2025	357	Joint MOTION Resolve Discovery Dispute - filed by Lam Research Corp.. (Smith, Rodger) (Entered: 03/26/2025)
03/26/2025	358	Letter to The Honorable Christopher J. Burke from Rodger D. Smith II regarding Emergency Request for Relief. (Attachments: # 1 Exhibits 1-4)(Smith, Rodger) (Main Document 358 replaced on 3/26/2025) (sam). Modified on 3/26/2025 (sam). (Entered: 03/26/2025)
03/26/2025	359	MOTION for Pro Hac Vice Appearance of Attorney Alia M. Orbin Ph.D. - filed by Lam Research Corp.. (Attachments: # 1 Certification of Alia M. Orbin Ph.D.)(Gorman, John) (Entered: 03/26/2025)
03/26/2025	360	Pro Hac Vice Fee - Credit Card Payment received for Alia M. Orbin Ph.D.. (re 359 MOTION for Pro Hac Vice Appearance of Attorney Alia M. Orbin Ph.D.)(Payment of \$ 50, receipt number ADEDC-4646131).(Gorman, John) (Entered: 03/26/2025)
03/26/2025	361	Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding response to Lam's emergency motion - re 358 Letter. (Poff, Adam) (Entered: 03/26/2025)
03/26/2025		CORRECTING ENTRY: D.I. 358 unsealed per request of filing counsel without objection from opposing counsel. (sam) (Entered: 03/26/2025)
03/26/2025	362	[SEALED] Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Response To Lam's "Emergency Letter" Seeking To Extend Agreed-Upon And So-Ordered Deadlines, And Delay Trial - re 358 Letter. (Attachments: # 1 Exhibit 1 - 17)(Poff, Adam) (Entered: 03/26/2025)
03/27/2025	363	MOTION for Pro Hac Vice Appearance of Attorney Kerisha Bowen, Ph.D. - filed by Lam Research Corp.. (Attachments: # 1 Certification of Kerisha Bowen, Ph.D.)(Dudash, Amy) (Entered: 03/27/2025)
03/27/2025	364	Pro Hac Vice Fee - Credit Card Payment received for Kerisha Bowen, Ph.D.. (re 363 MOTION for Pro Hac Vice Appearance of Attorney Kerisha Bowen, Ph.D.)(Payment of \$ 50, receipt number ADEDC-4647144).(Dudash, Amy) (Entered: 03/27/2025)
03/27/2025		SO ORDERED, D.I. 359 Motion for Pro Hac Vice Appearance of Attorney Alia M. Orbin Ph.D. - filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 03/27/2025. (sam) (Entered: 03/27/2025)
03/27/2025		SO ORDERED, D.I. 363 Motion for Pro Hac Vice Appearance of Attorney Kerisha Bowen, Ph.D. - filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 3/27/2025. (sam) (Entered: 03/27/2025)
03/27/2025	365	NOTICE OF SERVICE of Plaintiff's Amended Third Objections and Responses to Defendant's First Set of Interrogatories (Nos. 17) filed by Inpria Corporation.(Poff, Adam) (Entered: 03/27/2025)
03/27/2025		Pro Hac Vice Attorney Kerisha Bowen, Alia M. Orbin for Lam Research Corp. added for electronic noticing. Pursuant to Local Rule 83.5 (d)., Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (scs) (Entered: 03/27/2025)
03/27/2025	366	[SEALED] Letter to The Honorable Christopher J. Burke from Rodger D. Smith II regarding Response to Inpria's March 26, 2025 Letter - re 362 Letter., (Attachments: # 1 Exhibits 5-7)(Smith, Rodger) (Entered: 03/27/2025)
03/27/2025	367	MOTION for Pro Hac Vice Appearance of Attorney Amit Makker - filed by Lam Research Corp.. (Smith, Rodger) (Entered: 03/27/2025)
03/27/2025	368	Pro Hac Vice Fee - Credit Card Payment received for Amit Makker. (re 367 MOTION for Pro Hac Vice Appearance of Attorney Amit Makker)(Payment of \$ 50, receipt number ADEDC-4647442).(Smith, Rodger) (Entered: 03/27/2025)
03/27/2025	369	NOTICE requesting Clerk to remove Thomas W. Yeh as co-counsel.. (Smith, Rodger) (Entered: 03/27/2025)
03/27/2025	370	MOTION for Pro Hac Vice Appearance of Attorney Sami Al-Marzoog and Sean Gloth - filed by Lam Research Corp.. (Smith, Rodger) (Entered: 03/27/2025)
03/27/2025	371	Pro Hac Vice Fee - Credit Card Payment received for Sami Al-Marzoog and Sean Gloth. (re 370 MOTION for Pro Hac Vice Appearance of Attorney Sami Al-Marzoog and Sean Gloth)(Payment of \$ 100, receipt number ADEDC-4647627).(Smith, Rodger) (Entered: 03/27/2025)
03/27/2025	372	REDACTED VERSION of 352 Letter, by Inpria Corporation. (Attachments: # 1 Exhibit 1 - 5)(Poff, Adam) (Entered: 03/27/2025)
03/27/2025	373	ORAL ORDER: The Court hereby ORDERS that for the Court's administrative purposes, Defendant shall file a one-page Motion titled "Motion to Resolve Preliminary Injunction Hearing Dispute," by no later than the close of business today with respect to the issues raised in Defendants March 26, 2025 letter. (D.I. 358). Ordered by Judge Christopher J. Burke on 03/27/2025. (sam) (Entered: 03/27/2025)
03/27/2025	374	MOTION for Pro Hac Vice Appearance of Attorney Stephanie Adamakos - filed by Inpria Corporation. (Vrana, Robert) (Entered: 03/27/2025)
03/27/2025	375	Pro Hac Vice Fee - Credit Card Payment received for Stephanie Adamakos. (re 374 MOTION for Pro Hac Vice Appearance of Attorney Stephanie Adamakos)(Payment of \$ 50, receipt number ADEDC-4647925).(Vrana, Robert) (Entered: 03/27/2025)
03/27/2025	376	MOTION to Resolve Preliminary Injunction Hearing Disputes - - filed by Lam Research Corp.. (Smith, Rodger) (Entered: 03/27/2025)
03/27/2025	377	Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Inpria's Response to Lam's March 27, 2025 Letter - re 366 Letter. (Attachments: # 1 Exhibit 18)(Poff, Adam) (Entered: 03/27/2025)
03/28/2025		SO ORDERED, D.I. 367 Motion for Pro Hac Vice Appearance of Attorney Amit Makker - filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 03/28/2025. (sam) (Entered: 03/28/2025)
03/28/2025		SO ORDERED, D.I. 370 Motion for Pro Hac Vice Appearance of Attorney Sami Al-Marzoog and Sean Gloth - filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 03/28/2025. (sam) (Entered: 03/28/2025)
03/28/2025		SO ORDERED, D.I. 374 Motion for Pro Hac Vice Appearance of Attorney Stephanie Adamakos - filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 03/28/2025. (sam) (Entered: 03/28/2025)
03/28/2025	378	MOTION for Pro Hac Vice Appearance of Attorney Kimberly Q. Li and Shridhar Jayanthi - filed by Lam Research Corp.. (Clark, Cameron) (Entered: 03/28/2025)
03/28/2025	379	Pro Hac Vice Fee - Credit Card Payment received for Kimberly Q. Li and Shridhar Jayanthi. (re 378 MOTION for Pro Hac Vice Appearance of Attorney Kimberly Q. Li and Shridhar Jayanthi)(Payment of \$ 100, receipt number ADEDC-4648247).(Clark, Cameron) (Entered: 03/28/2025)
03/28/2025		Pro Hac Vice Attorney Stephanie Adamakos for Inpria Corporation added for electronic noticing. Pursuant to Local Rule 83.5 (d)., Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (scs) (Entered: 03/28/2025)
03/28/2025		SO ORDERED, D.I. 378 Motion for Pro Hac Vice Appearance of Attorney Kimberly Q. Li and Shridhar Jayanthi - filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 03/28/2025. (sam) (Entered: 03/28/2025)
03/28/2025	380	ORAL ORDER: The Court, having reviewed the parties' Motion to Resolve Preliminary Injunction Hearing Disputes, (D.I. 376), and the briefing related thereto, (D.I. 358 ; D.I. 362 ; D.I. 366 ; D.I. 377), hereby ORDERS as follows regarding the parties' disputes regarding the preliminary injunction ("PI") hearing-related schedule: (1) The key dispute here is whether any person who submits a declaration along with a side's preliminary injunction hearing-related briefing should be deposited before or after the pre-hearing briefing is concluded. The Court has seen this done various ways in patent cases in which it has addressed preliminary injunction motions. <i>See, e.g.</i> , Civil Action No. 23-819-JFB-EGT, Civil Action No. 21-129-CJB, Civil Action No. 19-1343-RGA, Civil Action No. 17-1390-RGA, Civil Action No. 15-819-LPS. The key point is that this issue (i.e., what type of PI motion-related deposition discovery would be needed, and when would it occur) really should have been addressed during the PI hearing schedule discussions that the Court previously ordered the parties to undertake. (D.I. 287 ; <i>see also</i> D.I. 362 at 1-2) That didn't happen here, and we are now too far down the road to alter the already agreed-upon PI motion briefing schedule (as Defendant wishes). To the extent that Defendant's concern is that it will not have a chance to capture in briefing any important details that a key witness mentions in a deposition, (D.I. 358 at 1-2; D.I. 366 at 1), the Court will consider permitting some focused, post-hearing briefing, which would permit this to occur (and would also allow the parties to put a finer point on why they think they should prevail regarding the PI motion, in light of what happened at the hearing itself)—just as it occurred in some of the Court's prior PI cases cited above.; and (2) With regard to the pre-PI hearing schedule: (a) The PI motion briefing schedule will remain the same and stay in effect.; (b) Any depositions sought relating to the PI hearing that have not already been scheduled or have already occurred will take place between the conclusion of pre-hearing briefing on April 10 and the PI hearing on April 25.; and (c) By April 11, 2025, the parties shall meet and confer and submit a joint letter indicating: (i) their view as to how much time should be allocated for the PI hearing; (ii) whether they currently intend to provide live testimony at the hearing, and, if so, the identity of the witnesses they intend to call; and (iii) their view as to whether short post-hearing supplemental briefing should be permitted, and if so, what type (i.e., page limits, and on what schedule). Ordered by Judge Christopher J. Burke on 03/28/2025. (sam) (Entered: 03/28/2025)
03/28/2025	381	MOTION for Pro Hac Vice Appearance of Attorney Krista Vink Venegas, Ph.D. - filed by Lam Research Corp.. (Attachments: # 1 Certification of Krista Vink Venegas, Ph.D.)(Dudash, Amy) (Entered: 03/28/2025)
03/28/2025	382	Pro Hac Vice Fee - Credit Card Payment received for Krista Vink Venegas, Ph.D.. (re 381 MOTION for Pro Hac Vice Appearance of Attorney Krista Vink Venegas, Ph.D.)(Payment of \$ 50, receipt number ADEDC-4648847).(Dudash, Amy) (Entered: 03/28/2025)
03/28/2025	383	ORAL ORDER: The Court has also reviewed Defendant's request to revise the current case schedule to, at a minimum, extend the close of fact discovery in this case to October 31, 2025, in order to allow for coordinated fact discovery between this case and the SUNY Action. (D.I. 358 at 3) Defendant has been aware of the SUNY case for a long time, and we have had a Scheduling Order in place in this matter since January 2024. (D.I. 59) In light of this, and for the reasons Plaintiff suggests, (D.I. 362 at 3-4), the referenced events relating to the SUNY Action would not be enough to demonstrate good cause to alter the case schedule here in the extensive manner that Defendant requests. That said, the Court is also cognizant that Plaintiff has now inserted a large preliminary injunction ("PI") process into the later part of the case schedule, and that fact alone might rightly require some further alteration of the schedule. The parties should further meet and confer regarding whether they can come to an agreement on a revised schedule that would reasonably allow for the obtaining of remaining SUNY-related inventorship discovery, factor in the impact of the PI process, and still permit the case to be tried

		in or reasonably close to December 2025. By no later than April 11, 2025, they shall advise the Court as to whether they have been able to reach any agreement on that score. Ordered by Judge Christopher J. Burke on 03/28/2025. (sam) (Entered: 03/28/2025)
03/28/2025		SO ORDERED, D.I. 381 Motion for Pro Hac Vice Appearance of Attorney Krista Vink Venegas, Ph.D. - filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 03/28/2025. (sam) (Entered: 03/28/2025)
03/31/2025	384	MOTION for Pro Hac Vice Appearance of Attorney Patricia Young - filed by Lam Research Corp.. (Clark, Cameron) (Entered: 03/31/2025)
03/31/2025	385	Pro Hac Vice Fee - Credit Card Payment received for Patricia Young. (re 384 MOTION for Pro Hac Vice Appearance of Attorney Patricia Young)(Payment of \$ 50, receipt number ADEDC-4649882). (Clark, Cameron) (Entered: 03/31/2025)
03/31/2025		SO ORDERED, D.I. 384 Motion for Pro Hac Vice Appearance of Attorney Patricia Young - filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 03/31/2025. (sam) (Entered: 03/31/2025)
03/31/2025	386	MOTION for Pro Hac Vice Appearance of Attorney Helen Gustafson - filed by Inpria Corporation. (Poff, Adam) (Entered: 03/31/2025)
03/31/2025	387	Pro Hac Vice Fee - Credit Card Payment received for Helen Gustafson. (re 386 MOTION for Pro Hac Vice Appearance of Attorney Helen Gustafson)(Payment of \$ 50, receipt number ADEDC-4650059).(Poff, Adam) (Entered: 03/31/2025)
03/31/2025		SO ORDERED, D.I. 386 Motion for Pro Hac Vice Appearance of Attorney Helen Gustafson - filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 03/31/2025. (sam) (Entered: 03/31/2025)
03/31/2025	388	[SEALED] ANSWERING BRIEF in Opposition re 315 MOTION for Preliminary Injunction filed by Lam Research Corp..Reply Brief due date per Oral Order, (D.I. 307), is 4/10/2025. (Smith, Rodger) Modified on 4/1/2025 (sam). (Entered: 03/31/2025)
03/31/2025	389	[SEALED] DECLARATION of Robert B. Dunteman re 388 Answering Brief in Opposition -- <i>Volume 1</i> -- by Lam Research Corp.. (Attachments: # 1 Exhibits 1-64, # 2 Exhibits 65-80)(Smith, Rodger) (Attachment 1 replaced on 4/10/2025) (sam). (Entered: 03/31/2025)
03/31/2025	390	[SEALED] DECLARATION of Robert B. Dunteman re 388 Answering Brief in Opposition -- <i>Volume 2</i> -- by Lam Research Corp.. (Attachments: # 1 Exhibits 81-150, # 2 Exhibits 151-165)(Smith, Rodger) (Attachment 1 replaced on 4/10/2025) (sam). (Entered: 03/31/2025)
03/31/2025	391	[SEALED] DECLARATION of Robert B. Dunteman re 388 Answering Brief in Opposition -- <i>Volume 3</i> -- by Lam Research Corp.. (Attachments: # 1 Exhibits 166-210, # 2 Exhibits 211-220)(Smith, Rodger) (Entered: 03/31/2025)
03/31/2025	392	[SEALED] DECLARATION of Robert B. Dunteman re 388 Answering Brief in Opposition -- <i>Volume 4</i> -- by Lam Research Corp.. (Attachments: # 1 Exhibits 221-231, # 2 Exhibits 232-241)(Smith, Rodger) (Entered: 03/31/2025)
03/31/2025	393	[SEALED] DECLARATION of Gary Bultman re 388 Answering Brief in Opposition by Lam Research Corp.. (Smith, Rodger) (Entered: 03/31/2025)
03/31/2025	394	[SEALED] DECLARATION of Kirk S. Schanze, Ph.D. re 388 Answering Brief in Opposition by Lam Research Corp.. (Attachments: # 1 Appendix 1-2)(Smith, Rodger) (Entered: 03/31/2025)
03/31/2025	395	[SEALED] DECLARATION of W. Todd Schoettelkotte re 388 Answering Brief in Opposition by Lam Research Corp.. (Attachments: # 1 Appendix 1-5)(Smith, Rodger) (Entered: 03/31/2025)
03/31/2025	396	[SEALED] DECLARATION of Pramod Subramonium re 388 Answering Brief in Opposition by Lam Research Corp.. (Smith, Rodger) (Entered: 03/31/2025)
03/31/2025	397	[SEALED] DECLARATION of Scott Thompson re 388 Answering Brief in Opposition by Lam Research Corp.. (Attachments: # 1 Attachment A-B)(Smith, Rodger) (Entered: 03/31/2025)
03/31/2025	398	[SEALED] DECLARATION of Richard Wise re 388 Answering Brief in Opposition by Lam Research Corp.. (Smith, Rodger) (Entered: 03/31/2025)
03/31/2025	399	NOTICE to Take Deposition of Gary Bultman on April 2, 2025 filed by Inpria Corporation.(Poff, Adam) (Entered: 03/31/2025)
03/31/2025	400	NOTICE to Take Deposition of Boris Volosskiy on April 3, 2025 filed by Inpria Corporation.(Poff, Adam) (Entered: 03/31/2025)
03/31/2025	401	NOTICE to Take Deposition of Daniel Peter on April 2, 2025 filed by Inpria Corporation.(Poff, Adam) (Entered: 03/31/2025)
03/31/2025	402	NOTICE to Take Deposition of Nizan Kenane on April 2, 2025 filed by Inpria Corporation.(Poff, Adam) (Entered: 03/31/2025)
03/31/2025		Set Briefing Schedule per Oral Order: D.I. 315 MOTION for Preliminary Injunction . Reply Brief due 4/10/2025. (sam) (Entered: 04/01/2025)
04/01/2025	403	MOTION for Pro Hac Vice Appearance of Attorney Cooper Lerner - filed by Inpria Corporation. (Poff, Adam) (Entered: 04/01/2025)
04/01/2025	404	Pro Hac Vice Fee - Credit Card Payment received for Cooper Lerner. (re 403 MOTION for Pro Hac Vice Appearance of Attorney Cooper Lerner)(Payment of \$ 50, receipt number ADEDC-4650626). (Poff, Adam) (Entered: 04/01/2025)
04/01/2025		SO ORDERED, D.I. 403 Motion for Pro Hac Vice Appearance of Attorney Cooper Lerner. Ordered by Judge Christopher J. Burke on 04/01/2025. (sam) (Entered: 04/01/2025)
04/01/2025	405	REDACTED VERSION of 327 Letter, by Lam Research Corp.. (Attachments: # 1 Exhibits A-J)(Clark, Cameron) (Entered: 04/01/2025)
04/01/2025	406	REDACTED VERSION of 356 Letter, by Lam Research Corp.. (Attachments: # 1 Exhibits K-N)(Clark, Cameron) (Entered: 04/01/2025)
04/01/2025	407	MOTION for Pro Hac Vice Appearance of Attorney Yi (Sunnie) Ning and Sarah Propst - filed by Lam Research Corp.. (Clark, Cameron) (Entered: 04/01/2025)
04/01/2025	408	Pro Hac Vice Fee - Credit Card Payment received for Yi (Sunnie) Ning and Sarah Propst. (re 407 MOTION for Pro Hac Vice Appearance of Attorney Yi (Sunnie) Ning and Sarah Propst)(Payment of \$ 100, receipt number ADEDC-4651360).(Clark, Cameron) (Entered: 04/01/2025)
04/02/2025		Pro Hac Vice Attorney Cooper Lerner, Helen Gustafson for Inpria Corporation added for electronic noticing. Pursuant to Local Rule 83.5 (d), Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (cdd) (Entered: 04/02/2025)
04/02/2025	409	STIPULATION TO EXTEND TIME for Plaintiff Inpria Corporation to file the public version of Inpria's Response to Lam's Emergency Letter Seeking to Extend Agreed-Up and So-Ordered Deadlines, and Delay Trial (D.I. 362) to April 4, 2025 - filed by Inpria Corporation. (Mackrides, Daniel) (Entered: 04/02/2025)
04/03/2025	410	NOTICE OF SERVICE of Notice of Deposition of Stephen Meyers filed by Lam Research Corp..(Smith, Rodger) (Entered: 04/03/2025)
04/03/2025		SO ORDERED, D.I. 409 STIPULATION TO EXTEND TIME for Plaintiff Inpria Corporation to file the public version of Inpria's Response to Lam's Emergency Letter Seeking to Extend Agreed-Up and So-Ordered Deadlines, and Delay Trial (D.I. 362) to April 4, 2025 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 04/03/2025. (sam) (Entered: 04/03/2025)
04/03/2025	411	NOTICE OF SERVICE of 1) Plaintiff's Third Supplemental Objections and Responses to Defendant's First Set of Interrogatories (Nos. 17); and 2) Plaintiff's Third Supplemental Objections and Responses to Defendant's Second Set of Interrogatories to Inpria (Nos. 814) filed by Inpria Corporation.(Vrana, Robert) (Entered: 04/03/2025)
04/03/2025	412	REDACTED VERSION of 362 Letter, by Inpria Corporation. (Attachments: # 1 Exhibit 1 - 17)(Poff, Adam) (Entered: 04/03/2025)
04/03/2025		SO ORDERED, D.I. 407 MOTION for Pro Hac Vice Appearance of Attorney Yi (Sunnie) Ning and Sarah Propst - filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 04/03/2025. (sam) (Entered: 04/03/2025)
04/03/2025	413	[SEALED] Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding the Parties' Inability to Agree Upon a Revised Schedule to Obtain SUNY-Related Discovery. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2)(Poff, Adam) (Entered: 04/03/2025)
04/03/2025	414	MOTION for Pro Hac Vice Appearance of Attorney Moushmi Datt Gazula - filed by Lam Research Corp.. (Attachments: # 1 Certification of Moushmi Datt Gazula)(Dudash, Amy) (Entered: 04/03/2025)
04/03/2025	415	Pro Hac Vice Fee - Credit Card Payment received for Moushmi Datt Gazula. (re 414 MOTION for Pro Hac Vice Appearance of Attorney Moushmi Datt Gazula)(Payment of \$ 50, receipt number ADEDC-4653463).(Dudash, Amy) (Entered: 04/03/2025)
04/04/2025	416	Letter to The Honorable Christopher J. Burke from Rodger D. Smith II regarding withdrawal of Exhibits 42, 118, and 144 to the Declaration of Robert B. Dunteman in Support of Defendant's Opposition to Plaintiff's Motion for Preliminary Injunction (D.I. 389-392). (Smith, Rodger) (Entered: 04/04/2025)
04/04/2025	417	Letter to The Honorable Christopher J. Burke from Rodger D. Smith II regarding request that the Court strike Inpria's letter (D.I. 413) - re 413 Letter. (Attachments: # 1 Exhibit A)(Smith, Rodger) (Entered: 04/04/2025)
04/04/2025	418	STIPULATION TO EXTEND TIME for Defendant Lam Research Corp. file a redacted version of D.I. 366 to April 7, 2025 - filed by Lam Research Corp.. (Clark, Cameron) (Entered: 04/04/2025)
04/04/2025		SO ORDERED, D.I. 414 Motion for Pro Hac Vice Appearance of Attorney Moushmi Datt Gazula - filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 04/04/2025. (sam) (Entered: 04/04/2025)
04/04/2025		SO ORDERED, D.I. 418 STIPULATION TO EXTEND TIME for Defendant Lam Research Corp. file a redacted version of D.I. 366 to April 7, 2025 filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 04/04/2025. (sam) (Entered: 04/04/2025)
04/07/2025	419	[SEALED] Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Inpria's Response to Lam's Request to Strike D.I. 413, and Inpria's Request for an Expedited Briefing Schedule to Challenge Lam's Privilege Claim - re 413 Letter, 417 Letter. (Attachments: # 1 Exhibit A - D)(Poff, Adam) (Entered: 04/07/2025)
04/07/2025	420	REDACTED VERSION of 366 Letter by Lam Research Corp.. (Attachments: # 1 Exhibits 5-7)(Clark, Cameron) (Entered: 04/07/2025)
04/07/2025	421	[SEALED] Letter to The Honorable Christopher J. Burke from Rodger D. Smith II regarding Inpria's April 7, 2025 Letter in Response to Lam's Request to Strike - re 419 Letter,. (Attachments: # 1 Exhibits A-B)(Smith, Rodger) (Entered: 04/07/2025)
04/08/2025	422	NOTICE OF SERVICE of 1) Plaintiff's Fourth Supplemental Objections and Responses to Defendant's First Set of Interrogatories (Nos. 17); 2) Plaintiff's Fourth Supplemental Objections and Responses to Defendant's Second Set of Interrogatories to Inpria (Nos. 814); and 3) Plaintiff's Objections and Responses to Defendant's Fourth Set of Interrogatories (Nos. 2325). filed by Inpria Corporation.(Poff, Adam) (Entered: 04/08/2025)

04/09/2025	423	NOTICE to Take Deposition of Rich Wise on April 10, 2025 filed by Inpria Corporation.(Poff, Adam) (Entered: 04/09/2025)
04/09/2025	424	Letter to The Honorable Christopher J. Burke from Rodger D. Smith II regarding Update to April 4, 2025 Letter - re 416 Letter. (Smith, Rodger) (Entered: 04/09/2025)
04/09/2025	425	NOTICE OF SERVICE of (1) Defendant's Objections and Responses to Plaintiff's Seventh Set of Requests for Production (Nos. 152-155); (2) Defendant's Fourth Supplemental Objections and Responses to Plaintiff's Second Set of Interrogatories (Nos. 4-13); (3) Defendant's Second Supplemental Objections and Responses to Plaintiff's Third Set of Interrogatories (Nos. 14-16); (4) Defendant's Second Supplemental Objections and Responses to Plaintiff's Fourth Set of Interrogatories (No. 17); (5) Defendant's Supplemental Objections and Responses to Plaintiff's Fifth Set of Interrogatories (Nos. 18-26); (6) Defendant's Objections and Responses to Plaintiff's Sixth Set of Interrogatories (Nos. 27-30); and (7) Defendant's Objections and Responses to Plaintiff's First Set of Requests for Admission (Nos. 1-50) filed by Lam Research Corp.(Dudash, Amy) Modified on 4/10/2025 (sam). (Entered: 04/09/2025)
04/09/2025	426	MOTION for Leave to File <i>Amicus Curiae Brief</i> - filed by The Research Foundation for The State University of New York. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2)(Farnan, Brian) (Entered: 04/09/2025)
04/09/2025	427	Letter to The Honorable Christopher J. Burke from Brian E. Farnan - re 426 MOTION for Leave to File <i>Amicus Curiae Brief</i> . (Farnan, Brian) (Entered: 04/09/2025)
04/10/2025		CORRECTING ENTRY: Documents at D.I. 389-1 and D.I. 390-1 have been replaced per letter at D.I. 424 and request from filing counsel without objection from opposing counsel. (sam) (Entered: 04/10/2025)
04/10/2025	428	Joint Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding resolution of discovery disputes. (Attachments: # 1 Text of Proposed Order)(Poff, Adam) (Entered: 04/10/2025)
04/10/2025	429	Joint MOTION to Resolve Discovery Disputes at April 25, 2025 Conference re 428 Letter - filed by Inpria Corporation. (Poff, Adam) (Entered: 04/10/2025)
04/10/2025	430	[SEALED] DECLARATION of Phillip Citroen (Volume 1 of 2)(Exhibits 223-295) <i>in Support of Inpria's Reply Brief in Support of Its Motion for Preliminary Injunction</i> by Inpria Corporation. (Attachments: # 1 Exhibit 223 - 249, # 2 Exhibit 250 - 264, # 3 Exhibit 266 - 284, # 4 Exhibit 285 - 295)(Poff, Adam) (Entered: 04/10/2025)
04/10/2025	431	[SEALED] DECLARATION of Phillip Citroen (Volume 2 of 2)(Exhibits A - M) <i>in Support of Inpria's Reply Brief in Support of Its Motion for Preliminary Injunction</i> by Inpria Corporation. (Attachments: # 1 Exhibit A - M)(Poff, Adam) (Entered: 04/10/2025)
04/10/2025	432	NOTICE OF SERVICE of Inpria Corporation's First Amended Initial Disclosures Pursuant to Fed. R. Civ. P. 26 filed by Inpria Corporation.(Poff, Adam) (Entered: 04/10/2025)
04/10/2025	433	[SEALED] DECLARATION of Bruce W. Smith, Ph.D. <i>in Support of Inpria's Motion for a Preliminary Injunction</i> by Inpria Corporation. (Poff, Adam) (Entered: 04/10/2025)
04/10/2025	434	REDACTED VERSION of 413 Letter by Inpria Corporation. (Poff, Adam) (Entered: 04/10/2025)
04/10/2025	435	[SEALED] REPLY BRIEF re 315 MOTION for Preliminary Injunction filed by Inpria Corporation. (Poff, Adam) (Entered: 04/10/2025)
04/10/2025	436	[SEALED] DECLARATION of Mohan Rao, Ph.D. re 435 Reply Brief by Inpria Corporation. (Poff, Adam) (Entered: 04/10/2025)
04/10/2025	437	NOTICE of Lodging of Multimedia Format by Inpria Corporation re 430 Declaration, (Poff, Adam) (Entered: 04/10/2025)
04/11/2025	438	ORAL ORDER: The Court has reviewed the parties' recent letters regarding claw back disputes that relate to the upcoming preliminary injunction hearing. (D.I. 416 ; D.I. 424 ; D.I. 428) The Court does not want 25 pages of single-spaced briefing as to claw back disputes over four documents. Therefore, the Court hereby ORDERS as follows: (1) By no later than April 14, 2025, the party seeking relief shall file with the Court a letter, not to exceed three (3) single-spaced pages, in no less than 12-point font, outlining the issues in dispute and that party's position on those issues.; (2) By April 18, 2025, any party opposing the application for relief may file a letter, not to exceed three (3) single-spaced pages, in no less than 12-point font, outlining that party's reasons for its opposition.; (3) By April 22, 2025, the party seeking relief shall file with the Court a reply letter brief, not to exceed one single-spaced page, in no less than 12-point font.; (4) The parties should also consult and follow Judge Burke's "Guidelines for Discovery Disputes," which is found in the "Guidelines" tab on Judge Burke's portion of the District Court's website.; (5) If the moving side wishes to argue about their claw back motion during the preliminary injunction hearing, they may, but the time for argument will be taken out of their total time allotted for the hearing. In their reply briefs, the parties can advise if they intend to argue their motion during the hearing.; and (6) The side seeking to claw back a document should keep in mind that they may need to also submit attached declaration(s) supporting any claim of privilege or work product protection or the like. Ordered by Judge Christopher J. Burke on 04/11/2025. (sam) (Entered: 04/11/2025)
04/11/2025	439	ORAL ORDER: The Court, having reviewed the Research Foundation for the State University of New York's ("SUNY") Motion for Leave to File <i>Amicus Curiae</i> Brief ("Motion"), (D.I. 426 ; <i>see also</i> D.I. 427), hereby ORDERS that by no later than April 14, 2025, SUNY and Plaintiff and Defendant shall meet and confer and file a joint letter, no longer than one single-spaced page, informing the Court as to whether the Motion will be opposed by any party. If the parties do not oppose the Motion, the Court will thereafter grant the Motion and permit SUNY to file its brief regarding dismissal or a stay (and will set out a full briefing schedule). If the parties do oppose the motion, any party opposing the Motion may file a (hopefully short) brief in opposition to the Motion on the date provided by the Local Rules. Ordered by Judge Christopher J. Burke on 04/11/2025. (sam) (Entered: 04/11/2025)
04/11/2025	440	Letter to The Honorable Christopher J. Burke from Rodger D. Smith II regarding Revised Schedule. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D)(Smith, Rodger) (Entered: 04/11/2025)
04/11/2025	441	MULTI MEDIA DOCUMENT filed by Inpria Corporation in the form of 2 USB Drives. Filing related to 437 Notice (Other). (Media on file in chambers.) (sam) (Entered: 04/11/2025)
04/11/2025	442	Joint Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Preliminary Injunction hearing - re 380 Oral Order. (Poff, Adam) Modified on 4/14/2025 (sam). (Entered: 04/11/2025)
04/14/2025	443	ORAL ORDER: The Court, having reviewed the parties' letters regarding a proposed new schedule and the filing at D.I. 413 , (D.I. 413 ; D.I. 417 ; D.I. 419 ; D.I. 421 ; D.I. 440), and regarding the April 25 preliminary injunction hearing. (D.I. 442), hereby ORDERS as follows: (1) With regard to Defendant's request that D.I. 413 be stricken, it is DENIED, at least for now. In line with Plaintiff's arguments, the Court does not see how Defendant has demonstrated that in filing D.I. 413 and its Exhibit 2, Plaintiff clearly did something that violates the Federal Rules of Civil Procedure, the Protective Order in this case, or Plaintiff's counsel's ethical obligations (in that it is not entirely clear to the Court, for the reasons Plaintiff states, that Plaintiff knew or should have known that Exhibit 2 implicates privileged material). (D.I. 419 at 1-2) The document will remain under seal until the Court has resolved any dispute over whether Exhibit 2 is properly clawed back. (See D.I. 428 ; D.I. 438); (2) That said, Plaintiff's rush to consider the meet and confer process closed did it no favors in terms of providing the Court with meaningful input into a new schedule. In light of the unexpected entry of a resource-intensive preliminary injunction process at an already-busy point in the current case schedule, there is good cause to alter that schedule a bit, and Defendant's proposed new schedule, (D.I. 440 , ex. A), seems to the Court a measured, responsible proposal as to how to do that and still go to trial "reasonably close" to the current December 2025 trial date, (D.I. 383). The Court GRANTS Defendant's request for entry of that schedule (with certain alterations, set out below) and DENIES Plaintiff's counter-proposal, which would not have sufficiently addressed the above-referenced issues. (D.I. 440 at 4) By no later than April 15, 2025, the parties shall jointly submit a revised proposed Scheduling Order that matches Defendant's proposal except that: (a) it adds an 11:00 a.m. start time for the December 17, 2025 hearing on case dispositive and Daubert motions; (b) the pre-trial order will be due on March 27, 2026; (c) the pre-trial conference will be held at 10:00 a.m. on April 10, 2026; and (d) the trial will begin on April 20, 2026.; (3) The Court will not at this time make any order regarding SUNY's discovery coordination or claim narrowing (other than to note that this case surely needs narrowing). It will discuss those issues with counsel at the April 25 hearing.; and (4) The Court ADOPTS the parties' proposal for the format of the April 25 hearing, and it will give the parties 2 hours and 15 minutes each for argument at the hearing, to make sure they have enough time to address all of the issues. Additionally, with regard to post-hearing supplemental briefing, the parties shall file simultaneous supplemental briefs of no more than seven single-spaced pages on May 7, 2025. Ordered by Judge Christopher J. Burke on 04/14/2025. (sam) (Entered: 04/14/2025)
04/14/2025	444	REDACTED VERSION of 421 Letter by Lam Research Corp.. (Attachments: # 1 Exhibits A-B)(Clark, Cameron) (Entered: 04/14/2025)
04/14/2025	445	Letter to The Honorable Christopher J. Burke from Rodger D. Smith II regarding claw back. (Smith, Rodger) (Entered: 04/14/2025)
04/14/2025	446	NOTICE OF SERVICE of Amended Notice of Deposition of Dr. Mohan Rao filed by Lam Research Corp..(Smith, Rodger) (Entered: 04/14/2025)
04/14/2025	447	[SEALED] Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Plaintiff Inpria Corporation's Motion to Compel. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2)(Poff, Adam) (Entered: 04/14/2025)
04/14/2025	448	STIPULATION TO EXTEND TIME Plaintiff to file the public version of Inpria's Response to Lam's Request to Strike D.I. 413, and Inpria's Request for an Expedited Briefing Schedule to Challenge Lam's Privilege Claim (D.I. 419) to April 16, 2025 - filed by Inpria Corporation. (Mackrides, Daniel) (Entered: 04/14/2025)
04/14/2025	449	[SEALED] Joint Letter to The Honorable Christopher J. Burke from Rodger D. Smith II regarding the Parties' positions on SUNY's Motion for Leave to File Amicus Curiae Brief - re 443 Oral Order, 426 MOTION for Leave to File <i>Amicus Curiae Brief</i> . (Smith, Rodger) Modified on 4/15/2025 (sam). (Entered: 04/14/2025)
04/15/2025		SO ORDERED, D.I. 448 STIPULATION TO EXTEND TIME Plaintiff to file the public version of Inpria's Response to Lam's Request to Strike D.I. 413 , and Inpria's Request for an Expedited Briefing Schedule to Challenge Lam's Privilege Claim (D.I. 419) to April 16, 2025 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 04/15/2025. (sam) (Entered: 04/15/2025)
04/15/2025	450	NOTICE OF SERVICE of 1) Notice of Deposition of Scott Thompson; 2) Notice of Deposition of Kirk S. Schanze; and 3) Notice of Deposition of W. Todd Schoettelkotte filed by Inpria Corporation. (Poff, Adam) (Entered: 04/15/2025)
04/15/2025	451	STIPULATION TO EXTEND TIME for the parties to file a revised proposed Scheduling Order pursuant to the Court's April 14, 2025 order (D.I. 443) to April 17, 2025 - filed by Inpria Corporation. (Mackrides, Daniel) (Entered: 04/15/2025)
04/16/2025		SO ORDERED, D.I. 451 STIPULATION TO EXTEND TIME for the parties to file a revised proposed Scheduling Order pursuant to the Court's April 14, 2025 order (D.I. 443) to April 17, 2025 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 04/16/2025. (sam) (Entered: 04/16/2025)
04/16/2025	452	MOTION to Dismiss for Failure to Join a Party <i>or in the Alternative to Sever, Transfer, and Stay Proceedings</i> - filed by Lam Research Corp.. (Attachments: # 1 Proposed Order)(Smith, Rodger) (Entered: 04/16/2025)
04/16/2025	453	[SEALED] OPENING BRIEF in Support re 452 MOTION to Dismiss for Failure to Join a Party <i>or in the Alternative to Sever, Transfer, and Stay Proceedings</i> filed by Lam Research Corp..Answering Brief/Response due date per Local Rules is 4/30/2025. (Smith, Rodger) (Entered: 04/16/2025)
04/16/2025	454	[SEALED] DECLARATION of Sarah Propst re 452 MOTION to Dismiss for Failure to Join a Party <i>or in the Alternative to Sever, Transfer, and Stay Proceedings</i> - by Lam Research Corp.. (Attachments: # 1 Exs. A-H, # 2 Exs. I-J, # 3 Exs. K-L, # 4 Exs. M-AA, # 5 Ex. BB, part 1, # 6 Exs. BB, part 2 - DD)(Smith, Rodger) (Entered: 04/16/2025)
04/16/2025	455	Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding hyperlinked versions of Inpria's Preliminary Injunction briefs. (Poff, Adam) (Entered: 04/16/2025)
04/16/2025	456	REDACTED VERSION of 419 Letter, by Inpria Corporation. (Attachments: # 1 Exhibit A - D)(Poff, Adam) (Entered: 04/16/2025)
04/17/2025	457	MULTI MEDIA DOCUMENT filed by Inpria Corporation in the form of 2 USB Drives. Filing related to D.I. 455 Letter. (Media on file in Chambers.) (sam) (Entered: 04/17/2025)
04/17/2025	458	STIPULATION TO EXTEND TIME for the parties to file redacted versions of all sealed preliminary injunction filings (D.I. 316-325, 388-398, 430-431, 433, 435-436) to April 24, 2025 - filed by Lam Research Corp.. (Smith, Rodger) (Entered: 04/17/2025)

04/17/2025		SO ORDERED, D.I. 458 STIPULATION TO EXTEND TIME for the parties to file redacted versions of all sealed preliminary injunction filings (D.I. 316-325, 388-398, 430-431, 433, 435-436) to April 24, 2025 filed by Lam Research Corp. Ordered by Judge Christopher J. Burke on 04/17/2025. (sam) (Entered: 04/17/2025)
04/17/2025	459	STIPULATION TO EXTEND TIME for the parties to file a revised proposed Scheduling Order pursuant to the Court's April 14, 2025 order (D.I. 443) to April 21, 2025 - filed by Inpria Corporation. (Poff, Adam) (Entered: 04/17/2025)
04/18/2025	460	MOTION for Pro Hac Vice Appearance of Attorney Gawon Go - filed by Inpria Corporation. (Poff, Adam) (Entered: 04/18/2025)
04/18/2025	461	Pro Hac Vice Fee - Credit Card Payment received for Gawon Go. (re 460 MOTION for Pro Hac Vice Appearance of Attorney Gawon Go)(Payment of \$ 50, receipt number ADEDC-4665290),(Poff, Adam) (Entered: 04/18/2025)
04/18/2025	462	[SEALED] Letter to The Honorable Christopher J. Burke from Rodger D. Smith II regarding opposition to Inpria Corporation's Motion to Compel - re 447 Letter. (Smith, Rodger) (Entered: 04/18/2025)
04/18/2025	463	[SEALED] DECLARATION of Craig Opperman re 462 Letter - by Lam Research Corp.. (Attachments: # 1 Exhibits A-E)(Smith, Rodger) (Entered: 04/18/2025)
04/21/2025		SO ORDERED, D.I. 459 STIPULATION TO EXTEND TIME for the parties to file a revised proposed Scheduling Order pursuant to the Court's April 14, 2025 order (D.I. 443) to April 21, 2025 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 04/21/2025. (sam) (Entered: 04/21/2025)
04/21/2025		SO ORDERED, D.I. 460 Motion for Pro Hac Vice Appearance of Attorney Gawon Go - filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 04/21/2025. (sam) (Entered: 04/21/2025)
04/21/2025	464	REDACTED VERSION of 447 Letter by Inpria Corporation. (Poff, Adam) (Entered: 04/21/2025)
04/21/2025	465	Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Unresolved Discovery Disputes - re 314 Order. (Poff, Adam) Modified on 4/22/2025 (sam). (Entered: 04/21/2025)
04/21/2025	466	STIPULATION TO EXTEND TIME for the parties to file a revised proposed Scheduling Order pursuant to the Court's April 14, 2025 order (D.I. 443) to April 22, 2025 - filed by Inpria Corporation. (Mackrides, Daniel) (Entered: 04/21/2025)
04/22/2025		SO ORDERED, D.I. 466 STIPULATION TO EXTEND TIME for the parties to file a revised proposed Scheduling Order pursuant to the Court's April 14, 2025 order (D.I. 443) to April 22, 2025 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 04/22/2025. (sam) (Entered: 04/22/2025)
04/22/2025	467	ORAL ORDER: The Court, having reviewed the parties' April 21, 2024 letter regarding Plaintiff's two discovery disputes, (D.I. 465), hereby ORDERS as follows: (1) By April 29, 2025, the parties shall jointly file a Motion to Resolve Discovery Dispute.; (2) By April 29, 2025, Plaintiff shall file with the Court a letter, not to exceed three (3) single-spaced pages, in no less than 12-point font, outlining the issues in dispute and its position on those issues.; (3) By May 6, 2025, Defendant may file a letter, not to exceed three (3) single-spaced pages, in no less than 12-point font, outlining Defendant's reasons for its opposition.; (4) By May 12, 2025, Plaintiff shall file with the Court a reply letter brief, not to exceed one (1) single-spaced page, in no less than 12-point font.; (5) The parties should also consult and follow Judge Burke's "Guidelines for Discovery Disputes," which is found in the "Guidelines" tab on Judge Burke's portion of the District Court's website.; and (6) The Court will plan to resolve the disputes on the papers, unless: (a) it determines after reviewing the briefing that oral argument is needed; or (b) any party advises the Court in advance that, were argument to be set, a newer attorney will argue the dispute(s). see Standing Order Regarding Courtroom Opportunities for Newer Attorneys. https://www.ded.uscourts.gov/sites/ded/files/StandingOrder2017.pdf . If either of those circumstances occurs, then the Court will schedule oral argument on the dispute(s) in the future. Ordered by Judge Christopher J. Burke on 04/22/2025. (sam) (Entered: 04/22/2025)
04/22/2025	468	ORAL ORDER: In light of the fact that the parties will not present live testimony at the preliminary injunction hearing, (D.I. 442 at 1), the Court hereby ORDERS that the hearing will now begin at 10:00 a.m. on April 25, 2025 in Courtroom 2A. Ordered by Judge Christopher J. Burke on 04/22/2025. (sam) (Entered: 04/22/2025)
04/22/2025	469	[SEALED] Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Reply in Support of Motion to Compel - re 447 Letter. (Poff, Adam) (Entered: 04/22/2025)
04/22/2025	470	STIPULATION TO EXTEND TIME for the parties to file a revised proposed Scheduling Order pursuant to the Court's April 14, 2025 order (D.I. 443) to April 23, 2025 - filed by Inpria Corporation. (Mackrides, Daniel) (Entered: 04/22/2025)
04/23/2025		SO ORDERED, D.I. 470 STIPULATION TO EXTEND TIME for the parties to file a revised proposed Scheduling Order pursuant to the Court's April 14, 2025 order (D.I. 443) to April 23, 2025 filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 04/23/2025. (sam) (Entered: 04/23/2025)
04/23/2025	471	[SEALED] RESPONSE to Motion re 426 MOTION for Leave to File <i>Amicus Curiae Brief</i> filed by Inpria Corporation. (Poff, Adam) (Entered: 04/23/2025)
04/23/2025	472	Letter to The Honorable Christopher J. Burke from Rodger D. Smith II regarding Order Amending Case Schedule - re 443 Oral Order. (Attachments: # 1 Proposed Order)(Smith, Rodger) Modified on 4/24/2025 (sam). (Entered: 04/23/2025)
04/23/2025	473	Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Proposed Order Amending Case Schedule - re 443 Oral Order. (Attachments: # 1 Proposed Order Amending Case Schedule) (Poff, Adam) Modified on 4/24/2025 (sam). (Entered: 04/23/2025)
04/24/2025	474	NOTICE of Final Written Decision in IPR2024-00033 by Inpria Corporation (Attachments: # 1 Exhibit A)(Poff, Adam) (Entered: 04/24/2025)
04/24/2025	475	[SEALED] Letter to The Honorable Christopher J. Burke from Adam W. Poff regarding Discovery Disputes. (Attachments: # 1 Exhibit A)(Poff, Adam) Modified on 4/28/2025 (sam). (Entered: 04/24/2025)
04/24/2025	476	MOTION For Exemption of Persons from the District of Delaware's May 17, 2024 Standing Order on Personal Devices - filed by Inpria Corporation. (Attachments: # 1 Text of Proposed Order)(Poff, Adam) (Entered: 04/24/2025)
04/24/2025	477	SO ORDERED, D.I. 476 MOTION For Exemption of Persons from the District of Delaware's May 17, 2024 Standing Order on Personal Devices - filed by Inpria Corporation. Signed by Judge Christopher J. Burke on 04/24/2025. (sam) (Entered: 04/24/2025)
04/24/2025	478	MOTION for Exemption from the Standing Order Regarding Personal Electronic Devices - filed by Lam Research Corp.. (Smith, Rodger) (Entered: 04/24/2025)
04/24/2025	479	SO ORDERED, D.I. 478 MOTION for Exemption from the Standing Order Regarding Personal Electronic Devices - filed by Lam Research Corp. Signed by Judge Christopher J. Burke on 04/24/2025. (sam) (Entered: 04/24/2025)
04/24/2025	480	Letter to The Honorable Christopher J. Burke from Rodger D. Smith II regarding Inpria's April 24, 2025 Letter - re 475 Letter. (Smith, Rodger) (Entered: 04/24/2025)
04/24/2025	481	REDACTED VERSION of 388 Answering Brief in Opposition by Lam Research Corp.. (Clark, Cameron) (Entered: 04/24/2025)
04/24/2025	482	REDACTED VERSION of 389 Declaration, by Lam Research Corp.. (Attachments: # 1 Exhibits 1-80)(Clark, Cameron) (Entered: 04/24/2025)
04/24/2025	483	REDACTED VERSION of 390 Declaration, by Lam Research Corp.. (Clark, Cameron) (Entered: 04/24/2025)
04/24/2025	484	REDACTED VERSION of 391 Declaration by Lam Research Corp.. (Clark, Cameron) (Entered: 04/24/2025)
04/24/2025	485	REDACTED VERSION of 392 Declaration by Lam Research Corp.. (Clark, Cameron) (Entered: 04/24/2025)
04/24/2025	486	REDACTED VERSION of 393 Declaration by Lam Research Corp.. (Clark, Cameron) (Entered: 04/24/2025)
04/24/2025	487	REDACTED VERSION of 394 Declaration by Lam Research Corp.. (Attachments: # 1 Appendix 1-2)(Clark, Cameron) (Entered: 04/24/2025)
04/24/2025	488	REDACTED VERSION of 395 Declaration by Lam Research Corp.. (Attachments: # 1 Appendix 1-5)(Clark, Cameron) (Entered: 04/24/2025)
04/24/2025	489	REDACTED VERSION of 396 Declaration by Lam Research Corp.. (Clark, Cameron) (Entered: 04/24/2025)
04/24/2025	490	REDACTED VERSION of 397 Declaration by Lam Research Corp.. (Attachments: # 1 Attachment A-B)(Clark, Cameron) (Entered: 04/24/2025)
04/24/2025	491	REDACTED VERSION of 398 Declaration by Lam Research Corp.. (Clark, Cameron) (Entered: 04/24/2025)
04/24/2025	492	REDACTED VERSION of 316 Declaration, of Phillip Citroen - Volume 1 of 4 (Exhibits 1-50) by Inpria Corporation. (Poff, Adam) (Entered: 04/24/2025)
04/24/2025	493	REDACTED VERSION of 317 Declaration, of Phillip Citroen - Volume 2 of 4 (Exhibits 51 - 100) by Inpria Corporation. (Poff, Adam) (Entered: 04/24/2025)
04/24/2025	494	REDACTED VERSION of 318 Declaration, of Phillip Citroen - Volume 3 of 4 (Exhibits 101 - 160) by Inpria Corporation. (Poff, Adam) (Entered: 04/24/2025)
04/24/2025	495	REDACTED VERSION of 319 Declaration, of Phillip Citroen - Volume 4 of 4 (Exhibits 161-222) by Inpria Corporation. (Poff, Adam) (Entered: 04/24/2025)
04/24/2025	496	REDACTED VERSION of 320 Declaration of Stephen Meyers by Inpria Corporation. (Poff, Adam) (Entered: 04/24/2025)
04/24/2025	497	REDACTED VERSION of 321 Declaration of Mohan Rao, Ph.D. by Inpria Corporation. (Poff, Adam) (Entered: 04/24/2025)
04/24/2025	498	REDACTED VERSION of 322 Declaration of Bruce W. Smith, Ph.D. by Inpria Corporation. (Poff, Adam) (Entered: 04/24/2025)
04/24/2025	499	REDACTED VERSION of 323 Opening Brief in Support of 315 MOTION for Preliminary Injunction by Inpria Corporation. (Poff, Adam) (Entered: 04/24/2025)
04/24/2025	500	REDACTED VERSION of 430 Declaration, of Phillip Citroen (Volume 1 of 2)(Exhibits 223-295) by Inpria Corporation. (Poff, Adam) (Entered: 04/24/2025)
04/24/2025	501	REDACTED VERSION of 431 Declaration, of Phillip Citroen (Volume 2 of 2)(Exhibits A - M) by Inpria Corporation. (Poff, Adam) (Entered: 04/24/2025)
04/24/2025	502	REDACTED VERSION of 433 Declaration of Bruce W. Smith, Ph.D. by Inpria Corporation. (Poff, Adam) (Entered: 04/24/2025)
04/24/2025	503	REDACTED VERSION of 435 Reply Brief re 315 MOTION for Preliminary Injunction by Inpria Corporation. (Poff, Adam) (Entered: 04/24/2025)
04/24/2025	504	REDACTED VERSION of 436 Declaration of Mohan Rao, Ph.D. by Inpria Corporation. (Poff, Adam) (Entered: 04/24/2025)
04/25/2025	505	NOTICE requesting Clerk to remove Sami Al-Marzoog as co-counsel. Reason for request: No longer with firm. (Clark, Cameron) (Entered: 04/25/2025)
04/25/2025		Minute Entry for proceedings held before Judge Christopher J. Burke - Hearing on Plaintiff's Motion for Preliminary Injunction held on April 25, 2025. The Court heard the parties' arguments regarding Plaintiff's Motion for Preliminary Injunction. (D.I. 315) The Court took the matter under advisement. By no later than May 7, 2025, the parties shall file with the Court post-hearing supplemental briefs not

		to exceed five (5) single-spaced pages, in no less than 12-point font. Additionally, the Court adopted Plaintiff's proposed Scheduling Order. (D.I. 473 -1) The Court provided guidance regarding how to proceed with discovery. By no later than May 2, 2025, the parties shall meet and confer and submit to the Court a letter regarding case narrowing. The transcript shall serve as the substance of the Court's Order in these regards. APPEARANCES: A. Poff, R. Vrana, D. Mackrides, N. Modi, E. Dittmann, I. Ashkenazi, Y. Park, J. Bennett, P. Citroen, P. Anderson, D. Cheek, J. Palsys, S. Peachman, G. Go and R. Rothman for Plaintiff; R. Smith, M. Moore, C. Sanders, S. Propst, S. Gloth, S. Jayanthi and S. Ning for Defendant. (Court reporter: Stacy Ingram; Clerk: E. Rose) (sam) (Entered: 04/28/2025)
04/28/2025	506	ORAL ORDER: The Court, having reviewed Plaintiff's discovery dispute motion ("Motion"), (D.I. 283), via which Plaintiff asks the Court to compel Defendant to produce certain electronic notes that its witness, David Trussell, purportedly relied on during his deposition and to grant Plaintiff additional deposition time with Mr. Trussell, (D.I. 284 at 1), and the briefing related thereto, (D.I. 284 ; D.I. 289 ; D.I. 296), hereby ORDERS that the Motion is DENIED. Plaintiff's Motion is premised on the idea that Mr. Trussell used these notes during his deposition to "refresh memory" pursuant to Fed. R. Evid. 612, and that in light of that Rule or otherwise, the notes must be "produced" to Plaintiff. Fed. R. Civ. P. 612; <i>see also</i> (D.I. 284 at 1). But in the cited portions of Mr. Trussell's deposition, he does not acknowledge that he relied on the notes to refresh his memory; indeed, he says he did not review them substantively at all. (<i>Id.</i> , ex. A at 203-06 (<i>cited in</i> D.I. 284 at 1)) No other portion of the deposition transcript provided to the Court indicates otherwise. And though Plaintiff submitted videotaped excerpts of the deposition to attempt to show that Mr. Trussell was in fact using the notes to craft his testimony, (<i>id.</i> , exs. B-E), the Court has reviewed those excerpts along with others provided by Defendant, (<i>see</i> D.I. 289 , exs. 2-6), and it cannot clearly determine that this is what was happening (especially in light of Mr. Trussell's statements to the contrary). If Plaintiff's counsel thought that Mr. Trussell was looking over and utilizing the notes during different points in the deposition, it could have tried to make a better record to confirm this, <i>cf. Spork v. Peil</i> , 759 F.2d 312, 318 (3d Cir. 1985), but counsel apparently did not do so. The one time Plaintiff's counsel asked Mr. Trussell if he was consulting his notes during the deposition, Mr. Trussell denied it. (D.I. 284 , ex. A at 203); <i>see also Eli Lilly & Co. v. Arch Ins. Co.</i> , No. 1:13-cv-01770-LJM-TAB, 2017 WL 3838689, at *5 (S.D. Ind. Sept. 1, 2017). The Court does not have a sufficient record to conclude otherwise. Ordered by Judge Christopher J. Burke on 04/28/2025. (sam) (Entered: 04/28/2025)
04/28/2025	507	ORAL ORDER: The Court, with the understanding that the parties are working together to produce certain documents, hereby ORDERS that Plaintiff's Motion to Resolve Discovery Disputes, (D.I. 475), is DENIED without prejudice to renew. Ordered by Judge Christopher J. Burke on 04/28/2025. (sam) (Entered: 04/28/2025)
04/28/2025	508	ORDER AMENDING CASE SCHEDULE: (Fact Discovery completed by 7/18/2025, Opening Expert Reports due by 8/4/2025, Rebuttal Expert Reports due by 8/29/2025, Reply Expert Reports due by 9/17/2025, Expert Discovery due by 10/15/2025, Dispositive Motions due by 10/23/2025, A Hearing on Case Dispositive and <i>Daubert</i> Motions is set for 12/17/2025 at 11:00 AM in Courtroom 2A before Judge Christopher J. Burke, A Pretrial Conference is set for 4/10/2026 at 10:00 AM in Courtroom 2A before Judge Christopher J. Burke, A 5-day Jury Trial is set for 4/20/2026 at 09:30/09:00 AM in Courtroom 2A before Judge Christopher J. Burke. See Order for further deadlines.) Signed by Judge Christopher J. Burke on 04/28/2025. (sam) (Entered: 04/28/2025)
04/28/2025	509	ORAL ORDER: The Court, having reviewed Plaintiff's recent filing, (D.I. 471), in which it drops its opposition to the Research Foundation for The State University of New York's ("SUNY") motion for leave to file <i>amicus curiae</i> brief ("motion for leave"), (D.I. 426), hereby ORDERS that the now-unopposed motion for leave is GRANTED. Ordered by Judge Christopher J. Burke on 04/28/2025. (sam) (Entered: 04/28/2025)
04/28/2025	510	ORAL ORDER: The Court, having reviewed Plaintiff's discovery dispute motion ("Motion"), (D.I. 429), via which Plaintiff requests that the Court compel Defendant to produce two documents (the "Competitive Update" and the "Value Model"), which Defendant clawed back as being subject to privilege claims, and the briefing related thereto, (D.I. 447 ; D.I. 462 ; D.I. 469), hereby addresses the portion of the Motion relating to the Competitive Update. It GRANTS-IN-PART and DENIES-IN-PART this portion of the Motion in the manner and for the reasons that follow: (1) The Court agrees with Defendant, (D.I. 462 at 1), that it is appropriate to assess the document at issue on a section-by-section or portion-by-portion basis, as opposed to on an all-or-nothing basis, and it will do so herein.; (2) The Court additionally agrees with Defendant that any portions of the document that the Court finds below should remain redacted do not evidence a crime or fraud, (<i>id.</i> at 2), and that Plaintiff's cited cases to the contrary are not apposite for the reasons Defendant says, (<i>id.</i>), such that the crime-fraud exception is not relevant here.; (3) The "Background," "SUNY" and "Next steps" section of page 1 of the document (with the exception of two sentences in the "Next steps" section that are discussed below) should be unredacted. Those portions simply state facts that are not properly subject to a claim of attorney-client privilege. <i>See, e.g., Universal City Dev. Partners, Ltd. v. Ride & Show Eng'g, Inc.</i> , 230 F.R.D. 688, 691 (M.D. Fla. 2005).; (4) The two sentences in the "Next steps" section beginning with the word "If" shall remain redacted (i.e., the third and sixth sentences). These sentences clearly demonstrate the provision of advice about legal matters that almost certainly had to have come from an attorney, since only an attorney would have knowledge of the motion/timing-related issues discussed therein. (D.I. 463 at para. 2); (5) The one sentence in dispute on page 2 (beginning "Legal") shall also remain redacted, as it is a communication that discusses certain subject matter that Defendant's attorneys are investigating. (<i>Id.</i> at paras. 2-3); (6) As to the final section at issue—the "Strategy" section on page 1, it shall be unredacted. The Court is confident that the "[s]trategy" discussed therein cannot have come from Defendant's attorneys. That is because earlier in this case, in response to an accusation from Plaintiff's counsel, the Court asked Defendant's counsel whether counsel was engaging in a strategy of attempting to delay this case solely for delay's sake. (D.I. 330 at 43) And Defendant's counsel assured the Court that Defendant's attorneys were <i>not</i> engaged in such a "delay" strategy; to the contrary, Defendant's counsel explained to the Court that Defendant's legal strategy in this case "isn't about delay" or about trying to "unfairly slow things down[.]" (<i>Id.</i> at 44-46) The Court accepted that assertion then as being truthful, accurate and made in good faith; it continues to do so. And if that was and is so, then the content of the "Strategy" section here simply has to refer to a <i>business</i> -related strategy on Defendant's side driven by <i>business</i> people—not a <i>legal</i> strategy coming from Defendant's <i>attorneys</i> . Moreover, the content of the one sentence in that section underscores that it is primarily focused on business (not legal) concerns. The sentence is about how Defendant's <i>customers</i> will make decisions regarding the merits of certain technology and about how Defendant hopes to respond to its <i>customers'</i> mindset; while this content might relate in some way to a "litigation[.]" (D.I. 462 at 1), its subject matter is primarily about business concerns, not legal advice, (D.I. 447 at 1; D.I. 469 at 1). Therefore, what is written in that section (a section that, after all, is found in a document prepared by a non-attorney business person and that was shared with four non-attorney business people) cannot reflect advice given for the primary purpose of providing legal (as opposed to business) advice. It thus cannot be privileged. <i>See FTC v. AbbVie Inc.</i> , CIVIL ACTION NO. 14-5151, 2016 WL 4478803, at *7 (E.D. Pa. Aug. 25, 2016).; and (7) By no later than May 5, 2025, Defendant shall produce to Plaintiff a version of the Competitive Update document that complies with the instant Order. Ordered by Judge Christopher J. Burke on 04/28/2025. (sam) (Entered: 04/28/2025)
04/29/2025	511	STIPULATION Extending Briefing Schedule re 452 MOTION to Dismiss for Failure to Join a Party <i>or in the Alternative to Sever, Transfer, and Stay Proceedings</i> by Inpria Corporation. (Poff, Adam) (Entered: 04/29/2025)
04/29/2025	512	REDACTED VERSION of 469 Letter Reply in Support of Motion to Compel by Inpria Corporation. (Poff, Adam) (Entered: 04/29/2025)
04/29/2025	513	REDACTED VERSION of 471 Response to Motion for Leave to File Amicus Curiae Brief by Inpria Corporation. (Poff, Adam) (Entered: 04/29/2025)
04/29/2025		SO ORDERED, D.I. 511 Stipulation Extending Briefing Schedule re 452 MOTION to Dismiss for Failure to Join a Party or in the Alternative to Sever, Transfer, and Stay Proceedings filed by Inpria Corporation. (Answering Brief due 5/5/2025, Reply Brief due 5/14/2025.) Ordered by Judge Christopher J. Burke on 04/29/2025. (sam) (Entered: 04/29/2025)
04/29/2025	514	STIPULATION Modifying Discovery Dispute Deadlines re 467 Oral Order and 465 Letter by Inpria Corporation. (Poff, Adam) Modified on 4/30/2025 (sam). (Entered: 04/29/2025)
04/30/2025	515	NOTICE OF SERVICE of Defendant's Third Supplemental Objections and Responses to Plaintiff's Third Set of Interrogatories filed by Lam Research Corp..(Dudash, Amy) (Entered: 04/30/2025)
04/30/2025	516	ORAL ORDER: The Court, having reviewed Plaintiff's discovery dispute motion ("Motion"), (D.I. 429), via which Plaintiff requests that the Court compel Defendant to produce two documents (the "Competitive Update" and the "Value Model"), which Defendant clawed back as being subject to privilege claims, and the briefing related thereto, (D.I. 447 ; D.I. 462 ; D.I. 469), hereby addresses the portion of the Motion relating to the Value Model. It DENIES this portion of the Motion (such that the Value Model is successfully clawed back) for the reasons that follow: (1) Because this document amounts to one chart with interrelated content, (D.I. 463 , ex. B), the Court will treat it holistically here.; (2) The document's content was created entirely by Defendant's attorneys. (D.I. 463 at ¶¶ 5-6) A key and substantial portion of the chart involves a discussion of "Legal risks" to Defendant were a potential transaction to occur; in that section various legal matters are discussed, such as the likelihood that certain legal remedies will be imposed in certain scenarios, or the likelihood that additional litigation may be warranted, or what the outcome of such litigation might be. (<i>Id.</i> , ex. B) In light of this, the Court concludes that the primary purpose of the document was legal in nature and that the attorney-client privilege attaches. <i>See, e.g., United States v. Veolia Env't N. Am. Operations, Inc.</i> , Civ. No. 13-mc-03-LPS, 2014 WL 5511398, at *7 (D. Del. Oct. 31, 2014).; and (3) Additionally, Plaintiff has not met its burden to demonstrate that any prior production of the document was intentional, nor that inadvertent production should lead to waiver here. As to the former issue, the Court has little record about the circumstances surrounding the prior production of the document (i.e., no declarations or affidavits were submitted in that regard by Plaintiff), and Defendant's representation that the document's disclosure of certain content was inadvertent is plausible (even if it was previously produced in redacted form), in light of the volume of the production at issue and the demands placed on the parties and counsel during the discovery period. <i>See Regeneron Pharms., Inc. v. Amgen, Inc.</i> , Civil Action No. 22-697-JLH-SRF, 2024 WL 5431484, at *2 (D. Del. Aug. 26, 2024); (D.I. 462 at 3). And as to the latter issue, the Court concludes that the five-factor test for whether inadvertent disclosure should amount to waiver favors Defendant, for the reasons Defendant suggests. (D.I. 462 at 3) Ordered by Judge Christopher J. Burke on 04/30/2025. (sam) (Entered: 04/30/2025)
04/30/2025		SO ORDERED, D.I. 514 Stipulation Modifying Discovery Dispute Deadlines re 467 Oral Order and 465 Letter filed by Inpria Corporation. Ordered by Judge Christopher J. Burke on 04/30/2025. (sam) (Entered: 04/30/2025)
05/01/2025	517	REDACTED VERSION of 475 MOTION for Discovery by Inpria Corporation. (Poff, Adam) (Entered: 05/01/2025)

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Transaction Receipt			
05/02/2025 10:05:56			
PACER Login:	KaronFowle3R	Client Code:	
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EXHIBIT B

Gorman, John V.

From: ded_nefreply@ded.uscourts.gov
Sent: Wednesday, December 13, 2023 5:03 PM
To: ded_ecf@ded.uscourts.gov
Subject: Activity in Case 1:22-cv-01359-CJB Inpria Corporation v. Lam Research Corp. Amended Complaint

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U.S. District Court

District of Delaware

Notice of Electronic Filing

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Case Name: Inpria Corporation v. Lam Research Corp.
Case Number: [1:22-cv-01359-CJB](#)
Filer: Inpria Corporation
Document Number: [43](#)

Docket Text:

AMENDED COMPLAINT against Inpria Corporation- filed by Inpria Corporation. (Attachments: # (1) Exhibit A - L, # (2) Exhibit M - Y, # (3) Exhibit Z - HH, # (4) Exhibit II - RR)(Poff, Adam)

1:22-cv-01359-CJB Notice has been electronically mailed to:

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Document description:Main Document

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Document description:Exhibit A - L

Original filename:n/a

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Document description:Exhibit M - Y

Original filename:n/a

Electronic document Stamp:

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Document description:Exhibit Z - HH

Original filename:n/a

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Document description:Exhibit II - RR

Original filename:n/a

Electronic document Stamp:

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