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Cc:	DG-Sinotechnix
Subject:	[Ext] Sinotechnix v. Samsung - Plaintiff"s Motion(s) to Amend Infringement Contentions
Date:	Tuesday, May 20, 2025 3:34:19 PM
Attachments:	image001.png We sent you safe versions of your files.msg Sinotechnix - LED Assemblies Accused Product List.pdf

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Samsung counsel,

Plaintiff intends to move the Court to update the accused products in the infringement contentions to include the models that SAMSUNG-SINO_0296424 (updated BOM spreadsheet) indicates have the same LED Assembly as those already accused. While the updated BOM spreadsheet has over 5 million entries, the intent of the attached spreadsheet is to capture that updated list.

Plaintiff hoped, based on Samsung's representations at the last hearing, that Samsung would have more promptly produced technical information on the 514 products currently in discovery. Because Samsung has not done so, Plaintiff expects that it will need to move for amendment at least once more (and likely several times more) after Samsung produces more information on those products.

Plaintiff, however, does not want to burden the Court with multiple motions to amend its infringement contentions arising from Samsung's rolling production. Plaintiff would prefer to reach an agreement that would eliminate the need to move for amendment several times and thus lessen the burden on the Court. If Plaintiff instead filed a single motion to amend after Samsung has completed its production, would Samsung agree not to challenge the timeliness of that motion based the time that passed before Samsung completed its production on the 514 products? If Samsung will not agree to that proposal to lesson the burden on the Court, does Samsung have any other suggestions that Plaintiff can consider? Please let us know.

Please also give Plaintiff a date certain for when it can expect that Samsung will begin producing technical documents on the 514 products.

Bill

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