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March 1, 2017

*Via ECF*

Honorable Susan Richard Nelson  
Warren E. Burger Federal Building  
United States Courthouse  
316 North Robert Street  
St. Paul, MN 55101

**Mathias W. Samuel**  
Principal  
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Re: *Cutsforth, Inc. v. LEMM Liquidating Company, LLC, et al.*  
Case No. 12-cv-1200 (SRN/LIB)

Dear Judge Nelson:

On March 10, 2017 at 1:00 p.m., this court has scheduled argument on the parties' claim construction briefing in this case. As a number of courts have recognized "in today's practice of law, fewer cases go to trial and there are generally fewer speaking opportunities in court, particularly for young lawyers (i.e., lawyers practicing for less than seven years)." *See, e.g., Secured Structures, LLC v. Alarm Security Group, LLC, Order*, Civ. Act. No. 6:14-CV-930 (E.D. Tex., Mitchell, J., Jan. 22, 2016); <http://chipsnetwork.org/wp-content/uploads/2016/02/Judicial-Orders-re-Next-Gen-3-9-16.pdf>; [www.nextgenlawyers.com](http://www.nextgenlawyers.com) (judicial orders). As such, a number of courts "strongly encourage[] the parties to be mindful of opportunities for young lawyers to argue in front of the Court, particularly for motions where the young lawyer drafted or contributed significantly to the underlying motion or response." *See, e.g., id.*

Cutsforth believes the upcoming claim construction hearing affords such an opportunity and respectfully notifies the Court that it intends to have fourth year associate Conrad A. Gosen argue for certain contested terms at the upcoming claim construction hearing. Mr. Gosen has been deeply involved in the case for several years. Other lawyers for Cutsforth will argue the remaining terms. Cutsforth does not believe this division of the argument between Cutsforth's various counsel will unduly complicate the proceedings, and it will not require any additional time beyond what the Court has already allotted for the hearing.

Very truly yours,

*s/ Mathias W. Samuel*

Mathias W. Samuel

cc: Counsel of Record (via email)