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Filed on behalf of: Samsung Electronics Company, Ltd.

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NVIDIA CORPORATION
Petitioner

v.

SAMSUNG ELECTRONICS COMPANY, LTD.
Patent Owner

Case IPR2016-00134 Patent No. 8,252,675

Patent Owner's Preliminary Response to Petition for *Inter Partes* Review of U.S. Patent No. 8,252,675



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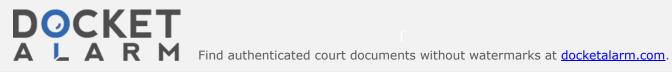


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I. Introduction

Patent Owner Samsung Electronics Company, Ltd. ("Patent Owner" or "Samsung") respectfully submits this preliminary response in accordance with 35 U.S.C. § 313 and 37 C.F.R. § 42.107, responding to the Petition for *Inter Partes* Review (the "Petition") filed by nVidia Corporation ("Petitioner" or "nVidia") against Samsung's U.S. Patent No. 8,252,675 ("the '675 patent"). This is Petitioner's second attempt at challenging the '675 patent. Petitioner previously filed a petition in IPR2015-01318 ("first petition") on June 1, 2015. The Board denied the first petition based on reasons articulated in Patent Owner's preliminary response. IPR2015-01318, Paper No. 8 (Dec. 7, 2015). Petitioner filed the instant petition after Patent Owner's preliminary response highlighted the deficiencies in Petitioner's first petition. The Board should not institute *inter partes* review for at least two reasons.

First, the Petition should be denied under 35 U.S.C. § 325(d), consistent with Board precedent and policy. The instant Petition impermissibly uses the Patent Owner's preliminary response to the first petition in IPR2015-01318 as a roadmap to remedy the errors Petitioner made in its first petition and advances the same or substantially the same prior art or arguments that Petitioner advanced in IPR2015-01318. Moreover, contrary to Petitioner's allegations, Petitioner's new prior art, U.S. Patent No. 8,563,669 to *Hsu* ("*Hsu*"), was known to Petitioner at the



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