

[REDACTED]

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS, INC.,
Petitioner,

v.

ATI TECHNOLOGIES ULC,
Patent Owner.

Case IPR2015-00326
Patent 6,897,871

**DECLARATION OF INVENTOR LAURENT LEFEBVRE
REGARDING THE INVENTION DATE OF U.S. PATENT NO. 6,897,871**

Mail Stop "Patent Board"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

LG Ex. 1037
LG v. ATI
IPR2015-00330



ATI 2006
LG v. ATI
IPR2015-00326

LG Ex. 1037, pg 1

ATI Ex. 2118
IPR2023-00922
Page 1 of 66

Table of Contents

I.	BACKGROUND	1
II.	CONCEPTION	3
A.	R400 Architecture Proposal	4
B.	R400 Top Level Specification.....	5
C.	R400 Shader Processor.....	7
D.	R400 Sequencer Specification	7
1.	R400 Sequencer Specification (Version 0.4): August 24, 2001.....	8
2.	R400 Sequencer Specification (Version 2.0): April 19, 2002.....	18
III.	DILIGENCE	21
A.	I Periodically Updated the R400 Sequencer Specification	21
B.	My Colleagues and I Continuously Developed and Debugged Emulation Code and RTL Code for the R400	22
IV.	TESTING SHOWED THAT THE RTL IMPLEMENTATION WORKED FOR ITS INTENDED PURPOSE	28
V.	DILIGENCE CALENDAR	33
VI.	EXHIBITS	61

[REDACTED]

I, Laurent Lefebvre, declare as follows:

I. BACKGROUND

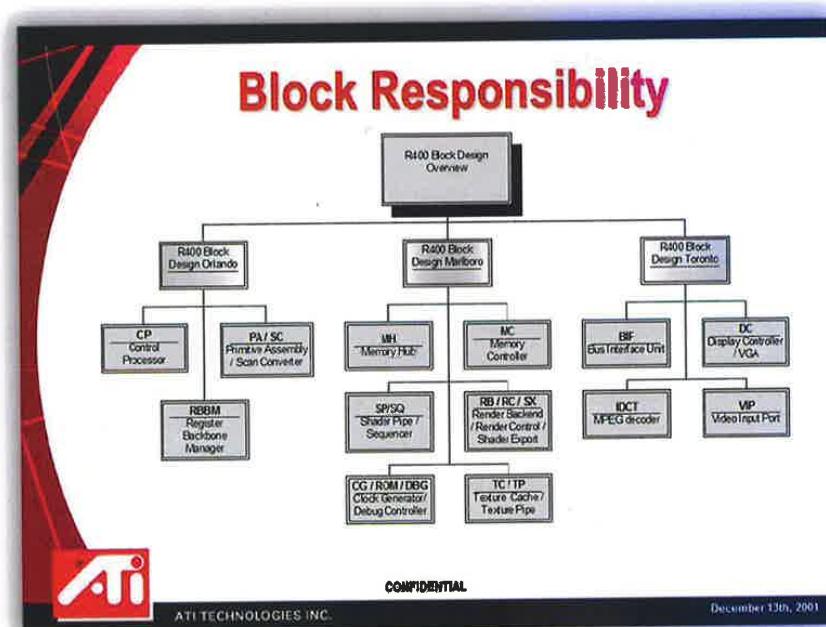
1. I am a computer-graphics hardware architect at AMD Inc. I have been designing computer-graphics processors for the past fifteen years. I specialize in sequencers, shaders, 3D-computer graphics, and integrated-circuit design.

2. From September 2000 to November 2006, I worked as an engineer and hardware architect for ATI Technologies Inc. ("ATI"). It is my understanding that ATI hired me to develop technologies for the R400, which is a graphics processor. Information relating to ATI's development of the R400 is confidential and proprietary. If this information became public, it would put ATI/AMD at a competitive disadvantage because it would give ATI/AMD's competitors access to proprietary algorithms, implementation details, and development schedules for the R400 design.

3. Unlike conventional graphics processors at the time, the R400 used a unified shader for both pixel commands and vertex commands—two types of commands required to produce an image. Conventional graphics processors had separate shaders for pixel commands and vertex commands. But a unified shader, like the R400's unified shader, enhances functionality and efficiency by allowing the same shader complex to be used for both pixel commands and vertex

commands. The R400's unified-shader architecture was later included in a chip called the Xenos chip. The Xenos chip was in the Microsoft® Xbox 360®.

4. The R400 includes many different functional blocks (e.g., the sequencer, shader pipe, primitive assembly, texture cache, texture pipe, raster engine, display, etc.). See, e.g., Ex. 2053, p. 6. The PowerPoint slide titled Block Responsibility (reproduced below) shows the ATI office responsible for designing each block.



Id.

[REDACTED]

5. For the R400 project, I was responsible for the sequencer block, which is the block that manages the execution of pixel commands and vertex commands for the unified shader. In particular, I drafted the high-level specification that describes the sequencer block's functionality, and I wrote emulator code for the sequencer block. In addition, I was also co-responsible for emulating the shader pipe block and the export block.

6. I am one of the named inventors of U.S. Patent No. 6,897,871 ("the '871 patent"). The other named inventors are Steve Morein, Andy Gruber, and Andi Skende. We collectively conceived of the graphics-processing system claimed in the '871 patent no later than early 2002, while working on the R400. *See infra* Part II. A team of my colleagues and I, which totaled about one hundred engineers, worked on the R400 nearly every business day from no later than early 2002 to November 20, 2003. *See infra* Parts III, V. No later than the third quarter of 2002, we made a GPU in register-transfer-language ("RTL") code that worked to process a first triangle. *See infra* Part IV.

II. CONCEPTION

7. No later than early 2002, Steve Morein, Andy Gruber, Andi Skende, and I collectively conceived of the graphics-processing system in the '871 patent. We each contributed different aspects to this system. Steve Morein came up with the idea for a unified shader. This is shown, for example, in documents titled

[REDACTED]

“R400 Architecture Proposal” and “R400 Top Level Specification.” Ex. 2040, p. 1; Ex. 2041, p. 1. Andy Gruber was the lead architect for the shader pipe. Andy Gruber worked with Andi Skende to come up with ideas for implementing the shader pipe and author the shader processor specification. This is shown, for example, in a document titled “Shader Processor.” Ex. 2042, p. 1. And I was the lead for the sequencer block. This is shown, for example, in a document titled “R400 Sequencer Specification.” *E.g.*, Ex. 2007, p. 1. I explain each of these documents in turn below.

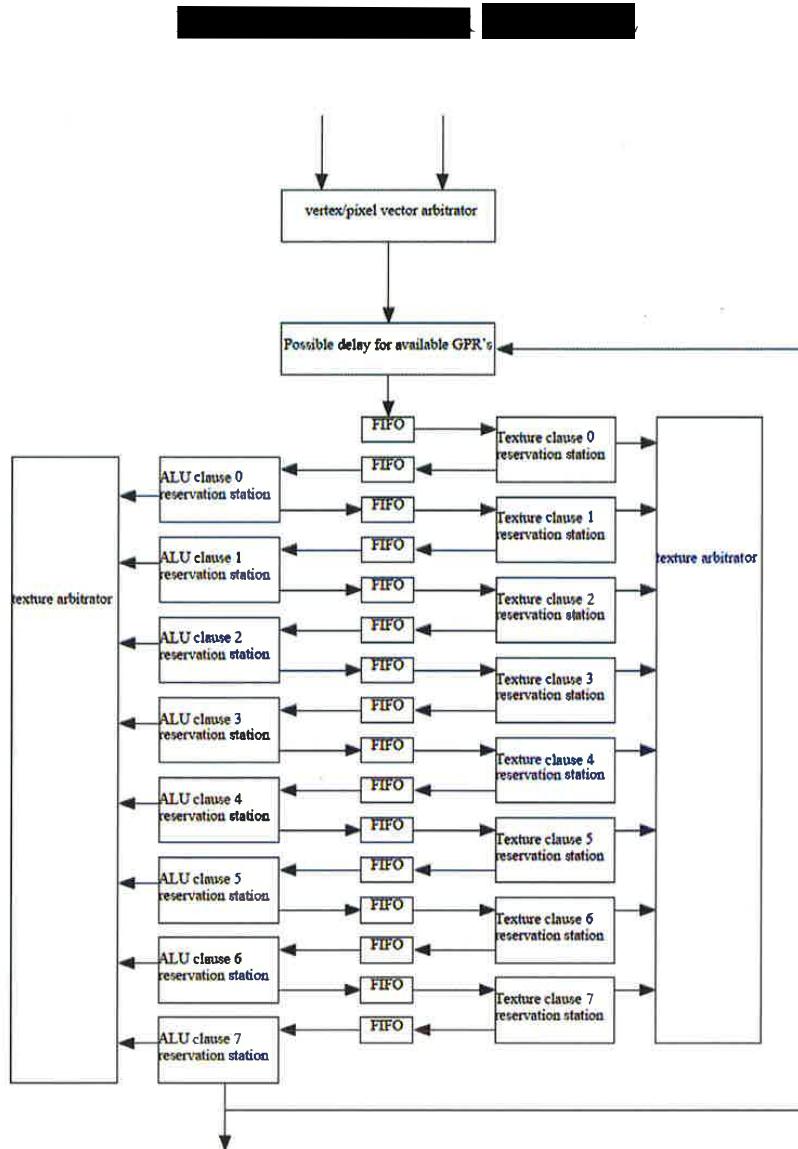
A. R400 Architecture Proposal

8. Steve Morein authored the “R400 Architecture Proposal.” Ex. 2040, p. 1. In this proposal, the R400 includes a unified shader that performs both pixel operations and vertex operations. *See id.* at 9. The R400 also includes a unified processing pipe (i.e., a single programmable pipeline for 2D video, 3D vertex, and 3D pixel operations). *See id.* at 6 (“The most ambitious feature in this design is the ‘truly unified pipe’: a single programmable pipeline.”). With a single pipeline for both pixel commands and vertex commands, the graphics processor had higher color precision and the ability to support more registers, compared with a conventional graphics pipeline. *See id.*

B. R400 Top Level Specification

9. Steve Morein also authored the “R400 Top Level Specification,” which sets forth the high-level architecture for the R400. Ex. 2041, p. 1. As shown in this document, the R400 Top Level Specification includes a sequencer. *See e.g.*, *id.* at 27-28, 30. The sequencer manages the instructions for the unified shader. *See id.* at 11 (“Before starting the processing . . . the rasterizer (which includes the sequencer for the shader pipeline) checks to make sure that there are enough free registers in the shader pipeline for the pixel shader program.”), 27 (“The raster engine . . . contains the sequencer for the shader pipe.”).

10. The R400 Top Level Specification includes a block diagram of the sequencer’s control flow (reproduced below for reference).



Id. at 30.

[REDACTED]

11. This block diagram includes three arbitrators¹: (1) a “vertex/pixel vector arbitrator” at the top of the diagram; (2) a “texture arbitrator” on the left side of the diagram; and (3) a “texture arbitrator” on the right side of the diagram. See *id.* The “texture arbitrator” on the left side is mislabeled. This arbitrator should be labeled “ALU arbitrator” to correspond to the ALU reservation stations. I describe the control flow for this block diagram in Part II.D.1 of this declaration.

C. R400 Shader Processor

12. Andy Gruber and Andi Skende authored the “Shader Processor,” which describes the shader architecture, interfaces, partitioning, and timing of the shader. Ex. 2042, p. 1. The shader processor had four identical Shader pipelines in the R400 architecture, each pipe capable of operating on ALU instructions for vertex parameters and pixel values. *See id.* at 5

D. R400 Sequencer Specification

13. I authored the “R400 Sequencer Specification,” which is the architectural specification for the R400 sequencer block. Ex. 2007, p. 1. There are

¹ The term “arbitrator” is interchangeable with the term “arbiter.” *See, e.g.,* Ex. 2023, pp. 9-10 (identifying the control flow diagram as: “Figure 2: Reservation stations and arbiters”).

[REDACTED]

at least thirty three revisions of this specification. *See* Ex. 2039, pp. 4-5; Exs. 2007-38. Each revision updates the specification.

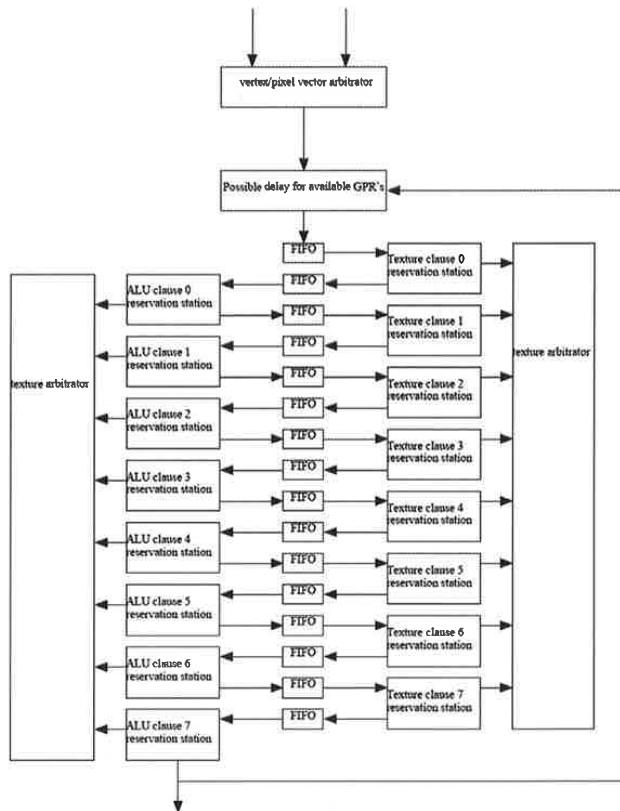
14. I developed two versions of the sequencer's control flow. *See* Ex. 2010; Ex. 2028. When I filed the patent application that led to the '871 patent, I intended this patent application to cover both versions of the sequencer's control flow.

15. The first version, described in Version 0.4 of the R400 Sequencer Specification, was designed for sixteen vertex clauses and sixteen pixel clauses. *See* Ex. 2010, pp. 5, 14-15. ATI presented this version to Microsoft to see whether the R400 was compatible with the application-programming interface ("API") that Microsoft was developing, called DX10. Microsoft rejected this version because Microsoft's API required a sequencer that could process an unlimited number of clauses. To be compatible with this requirement, I developed a second version of the sequencer control flow. This second version is described in Version 2.0 of the R400 Sequencer Specification. *See* Ex. 2028. I explain these versions in turn below.

1. R400 Sequencer Specification (Version 0.4): August 24, 2001

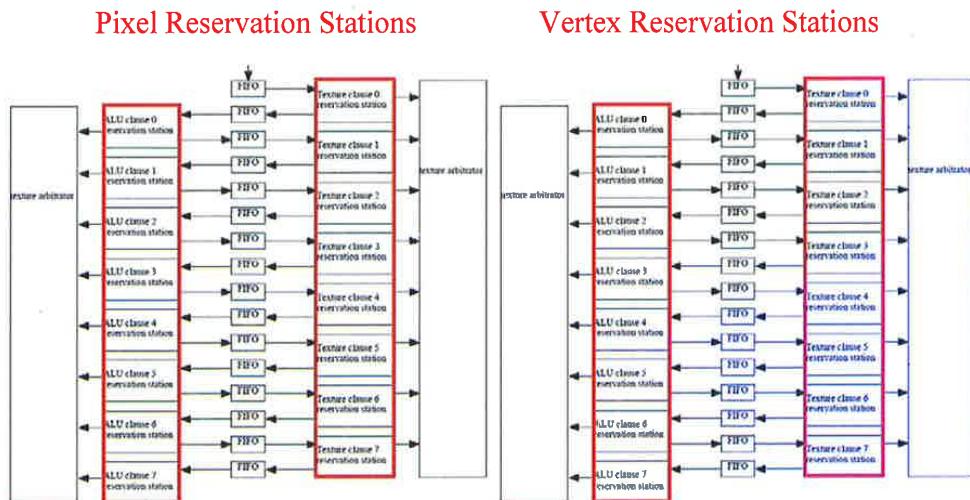
16. Version 0.4 of the R400 Sequencer Specification is dated August 24, 2001. *See* Ex. 2010, p. 3; *see also* Ex. 2043 (for the log entry on August 24, 2001).

This version includes the same sequencer-block diagram as the sequencer-block diagram in the R400 Top Level Specification (reproduced again below for convenience). *Compare* Ex. 2010, p. 5 with Ex. 2041, p. 30. Version 0.4 also includes an example of the flow of pixels and vertices through the system. *See* Ex. 2010, pp. 3, 17-19.



Ex. 2010, p. 5.

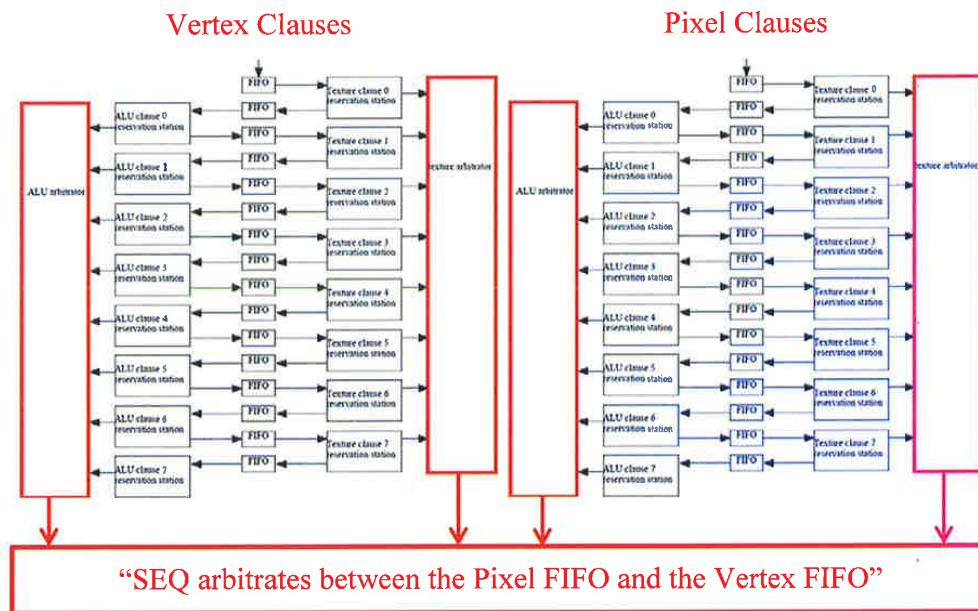
17. The sequencer has two sets of reservation stations, one for pixels and one for vertices. *Id.* at 4-5. A representation of the two sets of reservation stations is shown below. Each set has eight ALU reservation stations and eight texture reservation stations. *Id.* Each reservation station stores clauses. *Id.* These clauses contain a sequence of instructions. *Id.* at 4 (“[the sequencer] . . . executes all of the instructions in a clause”); *see also* Ex. 2042, p. 7 (“instructions in a clause will be executed sequentially”).



18. Clauses flow down each set of reservation stations. *See* Ex. 2010, pp. 4-5. Pixel clauses flow down the set of pixel reservation stations, and vertex clauses flow down the vertex reservation stations. *See id.* Reservation stations touch the arbiter, so the ALU arbiters and the texture arbiters can select clauses traveling down the reservation stations. *See id.* at 17 (“the control packet continues

to travel down the path of reservation stations until all clauses have been “executed”).

19. The arbiter/arbitration logic has two levels of arbitration, collectively shown in red on the figure below.



20. The first level of arbitration is between ALU clauses and texture clauses for both the vertex set of reservation stations and the pixel set of reservation stations. This first level of arbitration is represented by the ALU arbitrators and texture arbitrators labeled in the figure above. ALU arbitration logic

[REDACTED]

chooses one of the eight potentially pending ALU clauses stored within the ALU reservation stations. *See id.* at 14-15. Texture arbitration logic chooses one of the eight potentially pending texture clauses stored within the texture reservation stations. *See id.* at 14.

21. For the second level of arbitration, the arbitration logic selects between the pixel and the vertex. *See id.* at 17 (2) (“SEQ arbitrates between the Pixel FIFO and the Vertex FIFO”), 18 (4) (“SEQ arbitrates between Pixel FIFO and Vertex FIFO”). So, not only does the arbiter select which clauses to execute, the arbiter also selects which order to execute pixels and vertices. *See id.* at 4 (“a pixel can pass a vertex and a vertex can pass a pixel”).

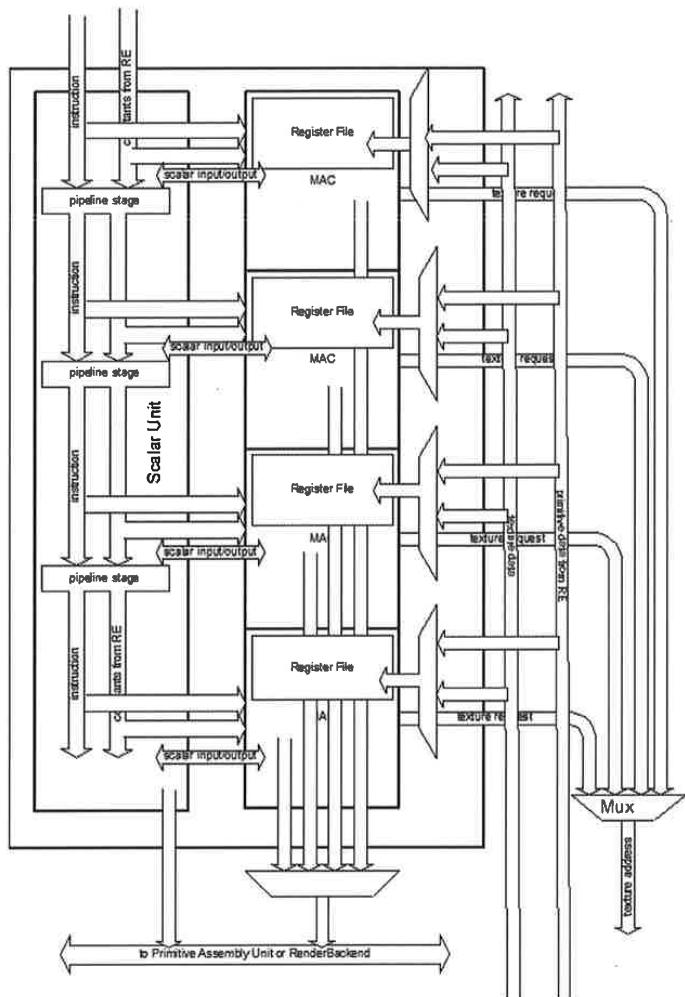
22. The ALU arbitration and the texture arbitration give priority to reservation stations/clauses closer to the bottom of the pipeline. *See id.* After this arbitration selects winning pixel and vertex clauses, the pixel/vertex arbitration logic selects between the pixel and the vertex. *Id.* at 17 (2), 18 (4). Vertices generally have priority. *Id.* at 17 (2). When a vertex is not pending or the register files do not have open space for a vertex, the arbiter selects a pixel. *Id.* at 18 (4).

23. Once arbitration logic selects the pixel/vertex clauses, the sequencer’s arbitration logic provides the clauses to a register file in the shader pipe. *See id.* at pp. 17 (5) (“SEQ constructs a control packet for the vector and sends it to the first

[REDACTED]

reservation station (the FIFO in front of texture state machine 0, or TSM0 FIFO) the control packet contains the state pointer, the tag to the position cache and a register file base pointer.”), 17 (9) (“ASM0 accepts the control packet (after being selected by the ASM arbiter) and gets the instructions for ALU clause 0 from the global instruction store”).

24. The shader pipe, as of Version 0.4 of the R400 Sequencer Specification (reproduced below for reference), has four physical register file memories per shader pipeline. *Id.* at 10.

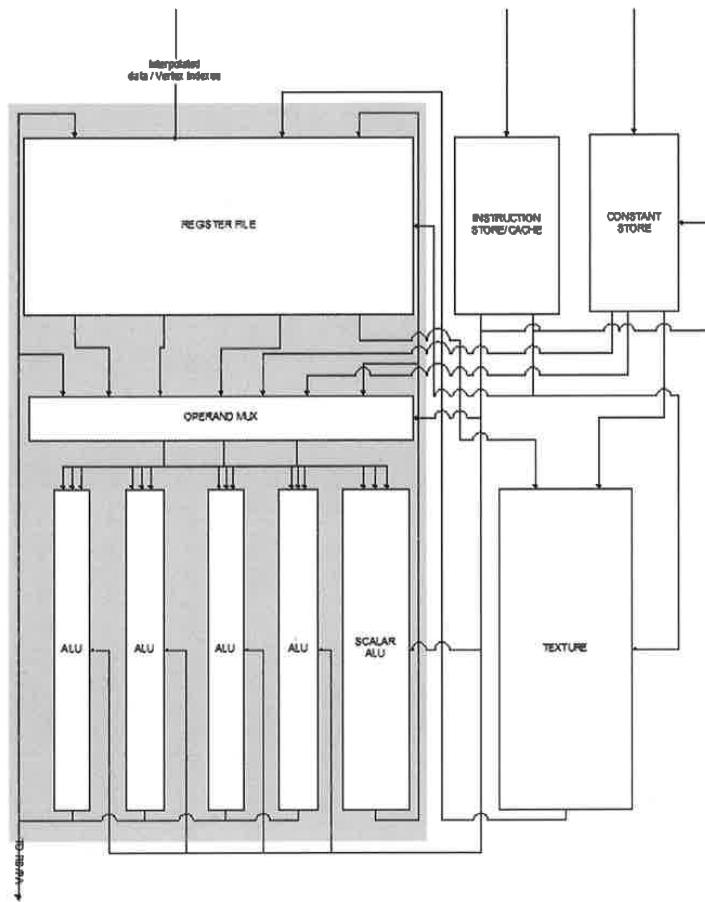


Id.

25. Each register file is coupled to a bank of ALUs. *See id.* at 11. The gray area of the Figure reproduced below shows the logical view of the four register files within the shader pipe as software would see it. *Id.* The Figure also

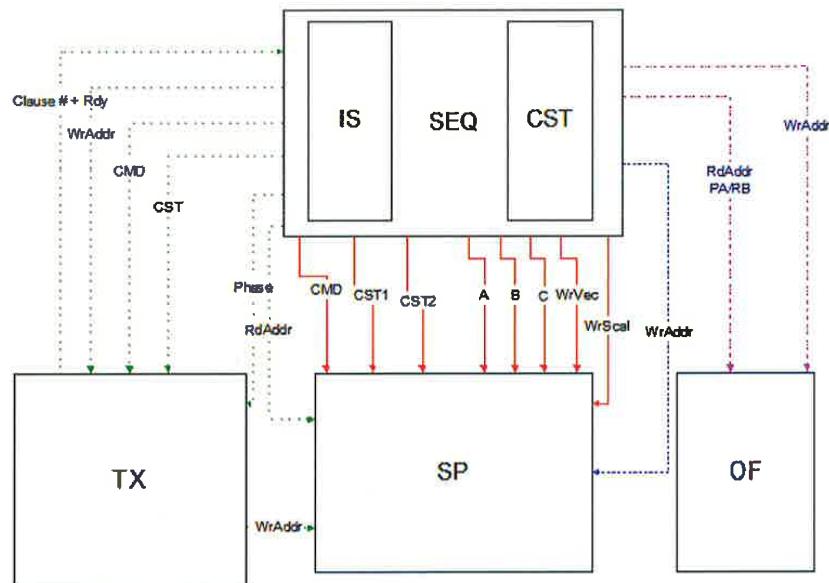
shows an ALU bank, a texture unit, an instruction store/cache, and a constant store.

See id.



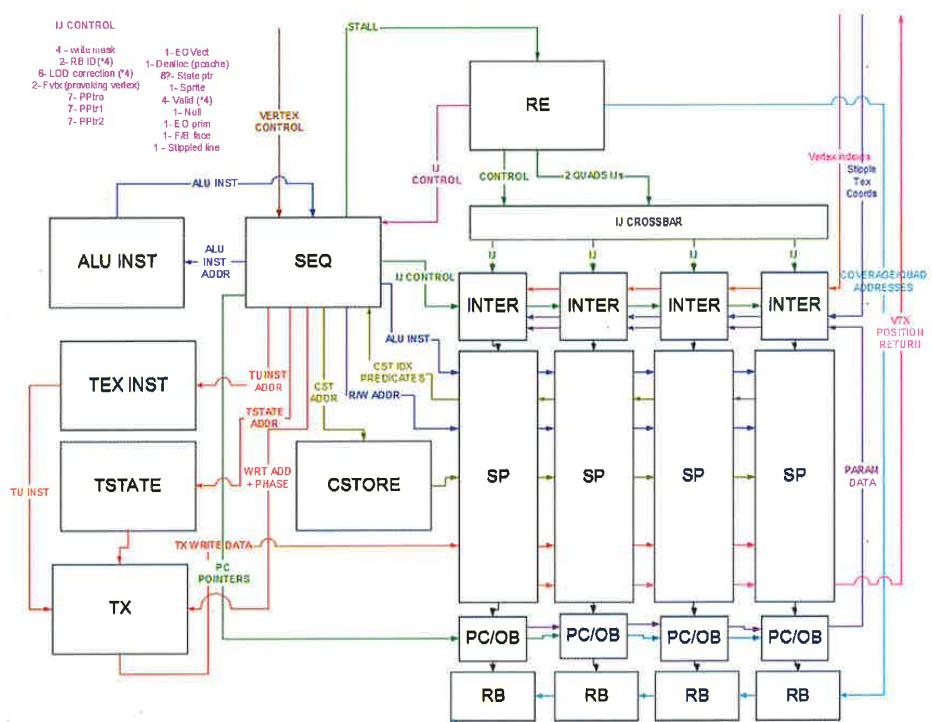
Id.

26. In the Figure reproduced above, the sequencer block comprises the instruction store and the constant store. In a different representation, reproduced below, the instruction store and the constant store are within the sequencer block.



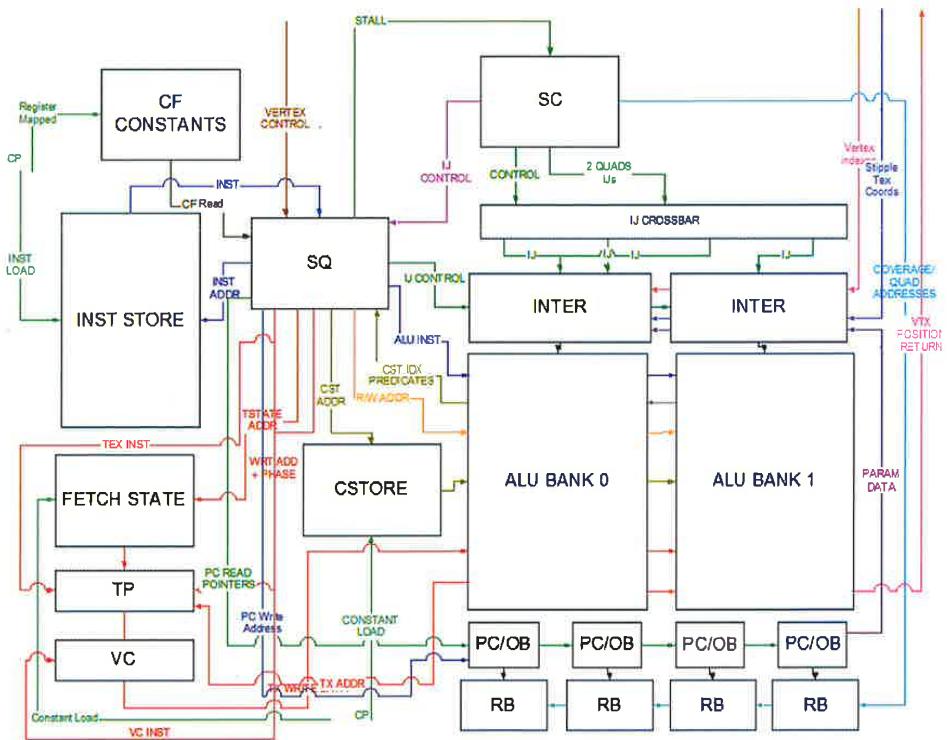
Id. at 12.

27. Later versions of the R400 Sequencer Specification show the sequencer and the shader pipe within the R400 architecture. *See, e.g.,* Ex. 2012, pp. 3, 5. The architecture in Version 0.6 of the R400 Sequencer Specification is reproduced below.



Id. at 5.

28. Following Version 0.6, the R400 architecture was kept in the R400 Sequencer Specification. *See, e.g.*, Ex. 2039, p. 7. A version of the R400 Sequencer Specification dated May 1, 2003 includes the R400 architecture reproduced below. The general role of the sequencer within this architecture did not change. And most inputs/outputs to/from the sequencer stay consistent.



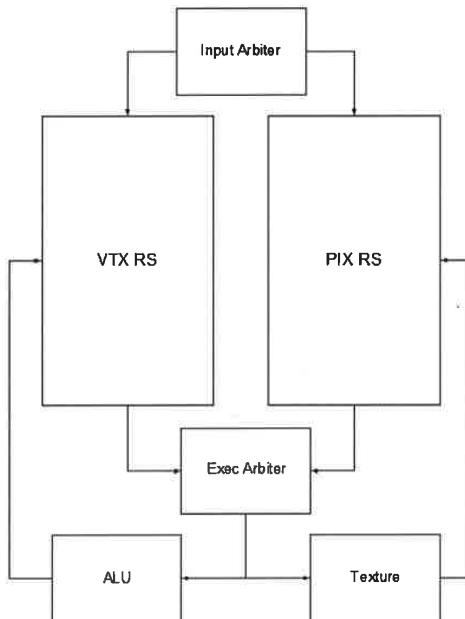
Id.

2. R400 Sequencer Specification (Version 2.0): April 19, 2002

29. The sequencer's control flow changed in Version 2.0 of the R400 Sequencer Specification. See Ex. 2028, pp. 5, 6, 10. Version 2.0 is dated April 19, 2002. See *id.* at 5; see also Ex. 2044 (for the log entry on April 19, 2002).

30. Again, the reason for the change was to meet the requirements of Microsoft's API, called DX10. In particular, Microsoft wanted the sequencer to be able to run shaders with an unlimited number of clauses/instructions. The first

control flow selected from sixteen vertex clauses and sixteen pixel clauses. *See Ex. 2010*, pp. 5, 14-15. To meet Microsoft's specifications, I changed the sequencer's control flow. The new control flow is shown below.



Ex. 2028, p. 10.

31. In this version, there is an input arbiter. *See id.* The input arbiter arbitrates between vectors of vertices that arrive from a primitive assembly and pixel vectors that are generated in a scan converter. *Id.* at 6 ("The sequencer first arbitrates between vectors of 64 vertices that arrive directly from primitive assembly and vectors of 16 quads (64 pixels) that are generated in the scan converter."). This version also has two reservation stations, one reservation station

[REDACTED]

for vertices (VTX RS) and one reservation station for pixels (PIX RS). *See id.* at 10. The texture threads and the ALU threads are not separated. *See id.* at 23 (“[W]ithout separate ‘texture clauses’ and ‘ALU clauses’ we need to know which instructions to dispatch to the Texture Unit and which to the ALU unit.”); *see also id.* at 6 (using the term thread). Each reservation station stores threads at specified locations with status bits indicating which engine is needed for execution. *See id.* at 25 (“A thread lives in a given location in the buffer during its entire life.”), 26 (“‘Status Bits’ needed include: . . . [a] Texture/ALU engine [identifier]”).

32. An arbiter, labeled as “Exec Arbiter,” selects threads for an ALU engine and a texture engine. *See id.* at 25. The arbiter selects a thread based on FIFO. *See id.* at pp. 6 (“The arbitrator will give priority to older threads.”), 25 (“[T]he buffer has FIFO qualities in that the threads leave in the order that they enter.”). The thread is then read out of a reservation station. *See id.* at 26. Once the texture engine or the ALU engine executes the thread, the respective engine returns the thread to the location from which the thread originated. *See id.* (“[The thread] is returned to the buffer (at the same place) with its status updated once all possible sequential instructions have been executed.”).

33. This version is present in later revisions of the Sequencer Specification. *See, e.g., Ex. 2039, p. 9.*

III. DILIGENCE

34. After conceiving of the design for the R400, my colleagues and I worked to implement it. This work is shown by at least two things: (1) I periodically updated the R400 Sequencer Specification; and (2) my colleagues and I continuously developed, tested, and debugged emulation code and RTL code for the R400, including the other components that supported and interacted with the sequencer.

A. I Periodically Updated the R400 Sequencer Specification

35. During development, the architectural leads for each block wrote specifications to describe the structure and function of the blocks. *See Ex. 2042, p. 1* (showing that specifications were used by designers). I was the architectural lead for the sequencer block, so I developed the R400 Sequencer Specification.

36. I updated the R400 Sequencer Specification approximately every two to three weeks. *See Ex. 2039, pp. 4-5* (outlining edits to the document). There are at least thirty three revisions of this document. *See id.; see also Exs. 2007-38*. The revisions span from at least May 25, 2001 to August 29, 2003. *See Ex. 2043, p. 2* (first log entry May 25, 2001); Ex. 2044, p. 1 (last log entry August 29, 2003); Ex. 2039, pp. 4-5 (showing 33 versions from May 7, 2001 to May 1, 2003).

[REDACTED]

37. Having multiple revisions during development is typical. Each revision showed progress during the previous week(s). During interim periods, the project team worked on outstanding issues. *See e.g.*, Ex. 2018, p. 35 (ending the document with a section labeled “Open Issues”).

B. My Colleagues and I Continuously Developed and Debugged Emulation Code and RTL Code for the R400

38. In the beginning of development, only a handful of engineers were assigned to the R400 project. But by late 2001 or early 2002, ATI assigned over one hundred project managers/designers to implement and test the R400. During these two years, many project managers/designers transitioned from other projects and were assigned to solely work on the R400 project. These project managers/designers, including me, diligently worked on the R400. In particular, we used the specifications to write emulation code and RTL code for the R400’s functional blocks. We then tested the R400’s functional blocks.

39. Everyone assigned to the R400 project saved their work in a revision-control system, called Perforce. I understand that Perforce maintains metadata (i.e., document logs and folder histories). This metadata includes information such as the date each file was revised and the user that made each revision.

40. I understand that this metadata identifies the following users as the users that worked on the R400 design. These users worked from three of ATI’s

[REDACTED]

offices: (1) Marlboro, Massachusetts, USA; (2) Orlando, Florida, USA; and (3) Toronto, Ontario, Canada. *See* Ex. 2053, p. 6. I recall that periodic meetings occurred to coordinate efforts between the three offices.

Address Prefix	Exhibits
aashkar	2050
abeaudin	2050, 2052
alleng	2050, 2051
amys	2049, 2052
ashishs	2049, 2050, 2052
askende	2048, 2049, 2050, 2051, 2052, 2072
bbloemer	2050, 2051
bbuchner	2050, 2051, 2052
beiwang	2050, 2051
bhankins	2049, 2050, 2052
brianf	2050, 2052
bryans	2050
cbrennan	2049, 2050, 2052
ccoveney	2050
chammer	2048, 2052

Address Prefix	Exhibits
chwang	2050
csampayo	2050, 2052
ctaylor	2048, 2049, 2050, 2051, 2052
danh	2048, 2049, 2052
dclifton	2048, 2049, 2050, 2051, 2052
desiree	2049
dglen	2050, 2051
donaldl	2048, 2049, 2050, 2052
dougd	2049, 2050, 2052
dwong	2050, 2051
efong	2049, 2050, 2052
enewman	2050
fghodrat	2050
fhsien	2049, 2050, 2052

Address Prefix	Exhibits	Address Prefix	Exhibits
fliljero	2050, 2052	jiezhou	2050
frising	2048, 2050	jimmylau	2050
frivas	2050, 2052	jling	2050
gabarca	2050	jmarsano	2050
georgev	2050, 2052	jowang	2050, 2051
grayc	2048, 2049, 2050, 2052	jyarasca	2050, 2052
gregs	2050	kcorrell	2050, 2051
hartogs	2048, 2049, 2050, 2051, 2052	keli	2050
hdong	2050	kevino	2050, 2052
hwise	2048, 2052	khabbari	2050
imuskatb	2050	kmahler	2048, 2050, 2052
jacarey	2050, 2051	kmeekins	2049, 2052
jasif	2050	koyu	2050
jasony	2051	kryan	2050, 2052
jayw	2050, 2051, 2052	lchen	2050
jbrady	2050	lkang	2050, 2051
jcox	2050	llefebvr	2048, 2049, 2050, 2051, 2052
jennho	2050	lseiler	2048, 2050, 2051, 2052
jhoule	2048, 2049, 2050, 2051, 2052	markf	2049, 2050, 2051, 2052

Address Prefix	Exhibits	Address Prefix	Exhibits
marklee	2050	rbagley	2050, 2051
mdesai	2050, 2052	rbeaudin	2048, 2050, 2051, 2052
mdoggett	2050, 2051, 2052	rbell	2049, 2050
mearl	2048, 2049, 2050, 2052	rfevreau	2050
mkelly	2048, 2050, 2052	rfisette	2050
moev	2049, 2050	rherrick	2050
mpersaud	2050	rramsey	2048, 2049, 2050, 2052
mmang	2048, 2049, 2050, 2052	rthambim	2050
mmantor	2048, 2049, 2050, 2052	rvelez	2050
mzhu	2050	sallen	2048, 2049, 2050, 2051, 2052
mzini	2048, 2049, 2052	sbagshaw	2050
nbarbier	2050	scamlin	2049, 2050
nkociuk	2050	scroce	2050
nluu	2050	semara	2050
omesh	2050, 2052	smburu	2050, 2052
paulv	2050, 2051, 2052	smorein	2050, 2051
pmitchel	2049, 2050, 2051, 2052, 2072	smoss	2049, 2050, 2052
peterp	2050	snezana	2050
prunstad	2050	tho	2050, 2052

Address Prefix	Exhibits	Address Prefix	Exhibits
tien	2049, 2050, 2052	vromaker	2048, 2049, 2050, 2052
tmartin	2050, 2052	whui	2050
tshah	2050	wlawless	2050, 2051
vbhatia	2050, 2052	ygiang	2048, 2049, 2050, 2052
vgoel	2050, 2052	yvalcour	2050
viviana	2049, 2052		
vliu	2048, 2050		

[REDACTED]

41. In Part V, I analyze this metadata. My analysis shows that at least one person on the R400 project team worked on the R400 design every non-holiday business day from early 2002 (when we conceived of the invention) until November 20, 2003 (the effective filing date of the '871 patent). *See infra* Part V.

42. This metadata is not exhaustive of all sequencer/shader-pipe files that were edited during this timeframe. But this metadata shows work that was necessary for implementing the R400 design. Specifically, this metadata shows the design, development, and testing of the R400 sequencer and graphics blocks. *See* Exs. 2048, 2049. This metadata also shows work on the design and development of the R400 generally. *See* Exs. 2050, 2051, 2052, 2072. The design and development of the R400 was necessary to make progress on the sequencer block and the shader pipe block; we could not work on or test the sequencer block or the shader pipe block in isolation.

43. This analysis is also consistent with my memory of the work that we did on the R400. For me and many of the other project managers/designers, the R400 was the only project that most of us were assigned to—it was our full-time responsibility. That means, any time that we did work for ATI between late 2001 and the end of 2003, that work would have been on the R400.

[REDACTED]

IV. TESTING SHOWED THAT THE RTL IMPLEMENTATION WORKED FOR ITS INTENDED PURPOSE

44. We ran many tests on the R400 during its development. One test in particular, the first triangle, showed that a snapshot of the emulation code and the RTL code worked for its intended purpose—i.e., performing conventional graphics processing using a unified shader.

45. For the R400 project, block-level specifications, block-level diagrams, and interface descriptions provided overarching development concepts. Project managers/designers on the R400 team used these documents to develop C++ code (emulation code) and RTL code for the various blocks of the R400. This code was tested extensively during the development process. Tests could be run on both the emulation code and the RTL code, and these tests could be run on individual blocks or the entire graphics core.

46. Circuit designers extensively use circuit simulation to test the GPU design. After the design has passed extensive testing, the chip design can be cleared for fabrication. Before sending out the design for fabrication, the RTL code is converted to a tape-out file, and that tape-out file is sent to a fabrication facility for fabrication.

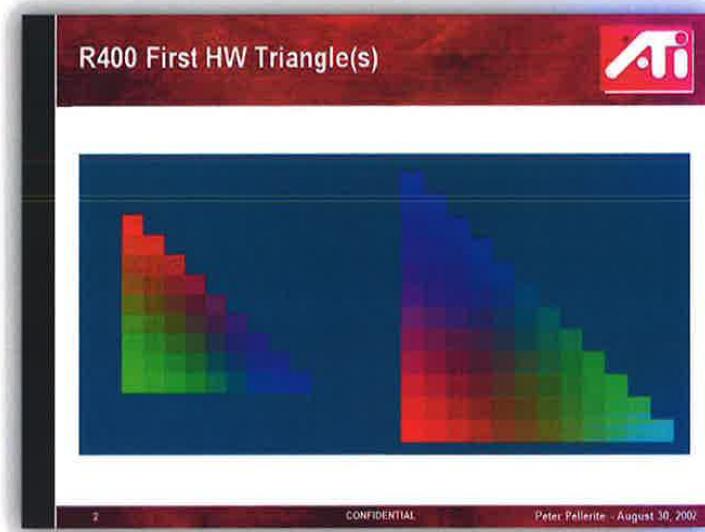
47. A product such as the R400 must pass thousands of tests before it is taped out. Many tests were directed to specific commercial specifications. Other

[REDACTED]

tests were more generic, such as tests for validation and proof of concept. One generic test was the first triangle.

48. The first triangle tested whether the RTL implementation of the GPU could process a Gouraud shaded triangle. At this stage of development, this test involved many different blocks—including the sequencer, the shader pipe, the shader export, the primitive assembly, and the raster engine blocks. *See Ex. 2058, p. 1; Ex. 2061, pp. 2-5.*

49. I recall the first triangle test being successful approximately mid-way through the R400 project. Consistent with my memory, the PowerPoint slide reproduced below shows that the first triangle was reported during a meeting on August 30, 2002.



Ex. 2066, p. 2. According to this presentation, the first triangle was completed on July 1, 2002. *Id.*, p. 6.

50. For a successful first triangle, the sequencer block and the shader pipe block must work together to process both vertex commands and pixel commands. This is shown, for example, in the RTL code that arbitrates between vertices and pixels. An example of this arbitration as implemented in the RTL code is reproduced below.

```
12      case (tta_current_state)
13          TTA0:
14      begin
15          // - ack is connected to TB State Mem read enable, so have to
16          // wait until the correct phase to ack
17
18          if ( state_read_phase == arb_type_strap )
19
20          if ( vtx_winner_vld_q)           // simply give verts the priority
21          begin
22              vtx_winner_ack = HI;
23              tta_next_state = TTA1;
24          end
```

```
1      else if ( pix_winner_vld_q )
2      begin
3          pix_winner_ack = HI;
4          tta_next_state = TTA2;
5      end
```

Ex. 2097, 18:12-19:5.

51. In this example code, the arbitration is implemented as a simple “if-else” statement in which vertices have priority. According to this “if-else” statement, “if” a vertex is ready for execution, the sequencer selects the vertex;

[REDACTED]

“else” (i.e., otherwise) the sequencer selects the pixel. That is it. The first triangle touched both paths because the vertex processing worked for the “if” path and the pixel processing worked for the “else” path. Other levels of arbitration in the RTL code worked like this example, and these other levels of arbitration would have been touched by the first triangle. So, following the first triangle, we knew the RTL code worked.

52. Passing the first triangle test did not signal the end of the R400 project; the R400 still had to pass many other tests to be commercializable. After processing a first triangle, however, we knew that we had an implementation of the R400 in RTL code that worked for its intended purpose—i.e., performing graphics processing using a unified shader.

V. DILIGENCE CALENDAR

Em. (R400 Sequencer Emulator Folder History, Exhibit 2048)
Parts (R400 Sequencer Parts Folder History, Exhibit 2049)
Lib. (R400 Document Library Folder History, Exhibit 2050)
Arch. (R400 Architecture Folder History, Exhibit 2051)
Test (R400 GFX Testing Folder History, Exhibit 2052)
SP Parts (R400 Shader Pipe Parts Folder History, Exhibit 2072)

August 2001						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24 Sequencer Specification	25
26	27	28 Lib., 434 Arch., 44 Test, 510	29 Arch., 43-44	30 Arch.; 43	31 Arch., 43	

September 2001

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
						1
2	3	4	5 Lib., 434	6	7 Arch., 43	8
9	10 Lib., 433-34 Arch., 43	11 Lib., 433 Arch., 43 Test, 510	12	13 Lib., 433	14 Lib., 433 Arch., 43	15
16	17 Arch., 43	18 Test, 509	19 Test, 509	20 Lib., 432-33 Arch., 42-43 Test, 509	21 Lib., 432 Arch., 42 SP Parts, 1	22
23	24 Lib., 432 Arch., 42	25 Lib., 432 Arch., 42 SP Parts, 1	26 Lib., 432 Arch., 42	27 Lib., 431-32 Arch., 41-42	28 Lib., 431 Arch., 41	29
30						

- 34 -

LG Ex. 1037, pg 36

October 2001

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	1 Lib., 431 Arch., 41	2 Lib., 431 Arch., 41	3 Lib., 431 Arch., 41	4 Lib., 430-31 Arch., 40-41	5 Lib., 430 Arch., 40	6
7	8 Lib., 430	9 Lib., 429 Arch., 39	10 Lib., 429 Arch., 39 Test, 509	11 Lib., 429 Arch., 39	12 Lib., 428-29 Arch., 38-39 Test, 509	13
14	15 Lib., 428 Arch., 38 Test, 509	16 Lib., 428 Arch., 37-38	17 Lib., 428 Arch., 37	18 Lib., 427-28 Arch., 37	19 Lib., 427 Arch., 37	20
21	22 Lib., 427 Arch., 36	23 Lib., 426-27 Arch., 35-36 Test, 509	24 Lib., 426 Arch., 34-35	25 SP Parts, 1	26 Lib., 425-26 Arch., 34 Test, 508-09	27
28	29 Arch., 34	30 Test, 508	31 Lib., 425 Arch., 34			

PROTECTIVE ORDER MATERIAL

November 2001						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1 Lib., 425 Arch., 34 Test, 508	2 Lib., 424-25 Arch., 33 Test, 508	3
4	5 Lib., 424 Arch., 32-33	6 Lib., 424 Arch., 32 Test, 508	7 Lib., 424 Arch., 32	8 Lib., 423-24 Arch., 31-32	9 Lib., 423 Arch., 31	10
11	12 Lib., 422-23 Arch., 30-31 Test, 508	13 Lib., 422 Arch., 30	14 Lib., 421-22 Arch., 29-30 SP Parts, 1	15 Lib., 420-21 Arch., 28-29	16 Lib., 420 Arch., 28	17
18	19 Lib., 419 Arch., 27-28	20 Lib., 419 Arch., 27	21 Lib., 419 Arch., 26-27 SP Parts, 1	22	23	24
25	26 Lib., 417-19 Arch., 26	27 Lib., 415-17 Arch., 25-26	28 Lib., 415 Arch., 24	29 Lib., 415	30 Lib., 414-15 Arch., 24	

- 36 -

LG Ex. 1037, pg 38

December 2001

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
						1
2	3 Parts, 136 Lib., 413-14 Arch., 24 SP Parts, 1	4 Lib., 413	5 Lib., 413	6 Lib., 412-13 Arch., 24	7 Lib., 412	8
9	10 Lib., 411-12	11 Lib., 411 Arch., 24	12 Em., 75 Arch., 23-24	13 Lib., 411 Arch., 23 Test, 508	14 Em., 74 Lib., 410-11 Arch., 23	15 Lib., 410
16	17 Lib., 409-10	18 Em., 74 Lib., 408-09	19 Em., 74 Lib., 407-08 Arch., 23	20 Em., 74 Lib., 406	21 Em., 74 Lib., 406	22
23	24 Lib., 405-06	25	26	27 Lib., 405	28 Lib., 405	29
30	31 Lib., 405					

January 2002

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
		1	2 Lib., 404	3 Em., 74 Lib., 404	4 Em., 73-74 Lib., 403	5
6 Em., 73 Lib., 402 Arch., 23 Test, 508	7 Em., 73 Lib., 401-02	8 Em., 73 Lib., 401-02	9 Em., 72-73 Lib., 399-401	10 Em., 72 Lib., 399 Arch., 23	11 Em., 72 Lib., 398 Arch., 23	12 Lib., 398
13	14 Lib., 397-98 Arch., 23	15 Lib., 396-97 Arch., 22-23	16 Em., 72 Lib., 396 Arch., 22	17 Lib., 395-96 Arch., 22	18 Em., 72 Lib., 394-95 Arch., 22	19
20	21 Em., 72 Lib., 392-94	22 Lib., 392	23 Em., 71-72 Lib., 390-92	24 Em., 71 Lib., 389-90 Arch., 22	25 Em., 71 Lib., 388-89 Arch., 22	26
27	28 Em., 71 Lib., 387-88 Arch., 22	29 Lib., 385-87 Arch., 22	30 Em., 71 Lib., 384-85	31 Em., 71 Lib., 383-84 Arch., 21		

February 2002

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					1 Em., 70 Lib., 382-83 Arch., 21	2
3 Lib., 382	4 Em., 70 Lib., 380-81 Arch., 21	5 Em., 70 Lib., 378-80	6 Em., 70 Lib., 378	7 Lib., 377-78	8 Em., 69-70 Lib., 376-77	9
10	11 Em., 69 Lib., 373-76	12 Em., 69 Lib., 372-73	13 Em., 68 Lib., 371-72	14 Em., 68 Lib., 370-71	15 Em., 68 Lib., 369-70	16 Lib., 369
17	18 Lib., 368-69	19 Lib., 367-68	20 Lib., 366-67 Arch., 21	21 Em., 68 Lib., 364-66 Arch., 21	22 Em., 68 Lib., 363-64 Arch., 20-21	23
24	25 Em., 68 Lib., 361-63	26 Lib., 360-61	27 Em., 68 Lib., 358-60	28 Em., 68 Lib., 357-58		

March 2002

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					1 Lib., 356-57	2
3	4 Em., 67 Lib., 355-56	5 Em., 67 Lib., 353-55	6 Em., 67 Lib., 351-53	7 Em., 66-67 Lib., 350-51	8 Parts, 136 Lib., 348-50 Arch., 20	9 Lib., 348
10 Lib., 348	11 Em., 66 Lib., 346-48	12 Lib., 345-46 Arch., 20	13 Lib., 345 Arch., 20	14 Em., 66 Lib., 344-45	15 Lib., 343-44 Arch., 20	16
17 Lib., 343	18 Em., 66 Lib., 341-43 Arch., 20	19 Em., 65-66 Parts, 136 Lib., 341	20 Parts, 136 Lib., 340-41	21 Em., 65 Lib., 339-40 Arch., 20	22 Em., 65 Lib., 337-39	23
24 Lib., 337	25 Lib., 335-37	26 Em., 65 Lib., 334-35 Arch., 20 Test, 507-08	27 Em., 65 Parts, 135-36 Lib., 332-33 Arch., 19-20	28 Lib., 331-32 Test, 507	29 Parts, 135 Arch., 19 Test, 507	30
31 Lib., 331						

- 40 -

LG Ex. 1037, pg 42

April 2002						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	1 Em., 65 Lib., 330-31 Arch., 19 Test, 507	2 Em., 65 Parts, 135 Lib., 328-30 Test, 506-07	3 Em., 64-65 Parts, 134-35 Lib., 327-28 Arch., 19 Test, 506	4 Em., 64 Lib., 326-27 Arch., 19	5 Em., 64 Lib., 324-26 Test, 505-06	6
7	8 Em., 64 Lib., 322-24 Test, 505	9 Em., 63-64 Lib., 321-22 Test, 505	10 Lib., 320-21 Arch., 19 Test, 505	11 Em., 63 Lib., 318-20 Test, 504-05	12 Em., 62-63 Lib., 317-18 Arch., 19 Test, 504	13 Lib., 317
14 Lib., 317	15 Em., 62 Lib., 315-17 Arch., 19 Test, 504	16 Parts, 134 Lib., 315 Test, 503-04	17 Em., 62 Lib., 314-15 Test, 503	18 Em., 62 Lib., 314 Test, 503	19 Parts, 134 Lib., 312-14 Test, 503	20
21	22 Lib., 311-12	23 Parts, 134 Lib., 310-11 Test, 503	24 Parts, 134 Lib., 309-10 Test, 502-03	25 Em., 62 Lib., 307-09 Arch., 19 Test, 502	26 Parts, 134 Lib., 306-07 Arch., 19 Test, 502	27
28	29 Lib., 304-06 Test, 501-02	30 Parts, 134 Lib., 303-04 Test, 501				

May 2002

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1 Parts, 134 Lib., 301-03 Test, 501	2 Lib., 299-301 Test, 500-01	3 Em., 62 Parts, 133-34 Lib., 297-98 Test, 499-500	4
5	6 Em., 61-62 Parts, 133 Lib., 294-97 Test, 499	7 Em., 61 Parts, 133 Lib., 293-94 Arch., 19 Test, 499	8 Em., 61 Parts, 132-33 Lib., 290-93 Test, 498	9 Em., 61 Parts, 132 Lib., 289-90 Test, 498	10 Em., 60-61 Parts, 132 Lib., 286-89 Test, 498	11
12	13 Lib., 284-86 Test, 497	14 Em., 60 Parts, 131-32 Lib., 281-83 Test, 497	15 Em., 60 Lib., 280-81 Test, 497	16 Em., 60 Parts, 131 Lib., 278-80 Test, 496	17 Em., 60 Parts, 131 Lib., 277-78 Test, 495-96	18
19 Lib., 277	20 Em., 59-60 Parts, 131 Lib., 276-77 Arch., 18 Test, 495	21 Em., 59 Parts, 131 Lib., 275-76 Arch., 18 Test, 494-95	22 Em., 59 Lib., 273-75 Test, 494	23 Em., 59 Parts, 130-31 Lib., 273 Arch., 18 Test, 494	24 Em., 59 Parts, 130 Lib., 272-73 Arch., 18 Test, 493-94	25 Lib., 272
26 Em., 59	27 Parts, 130 Lib., 271-72	28 Em., 58 Parts, 129-30 Lib., 270-71 Test, 493	29 Em., 58 Parts, 129 Lib., 269-70 Test, 492-93	30 Em., 58 Parts, 129 Lib., 268-69 Arch., 17 Test, 491-92	31 Em., 58 Parts, 128-29 Lib., 266-68 Test, 490-91	

- 42 -

LG Ex. 1037, pg 44

June 2002						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
						1
2 Parts, 128	3 Em., 58 Parts, 128 Lib., 264-66 Arch., 17 Test, 489-90	4 Em., 57-58 Parts, 127-28 Lib., 263-64 Arch., 17 Test, 489	5 Em., 57 Parts, 127 Lib., 261-62 Arch., 17 Test, 488-89	6 Parts, 126-27 Lib., 259-61 Arch., 16 Test, 487-88	7 Em., 57 Parts, 126 Lib., 257-59 Arch., 16 Test, 487	8
9 Lib., 257	10 Em., 57 Parts, 126 Lib., 255-57 Arch., 16 Test, 486-87	11 Em., 57 Parts, 125-26 Lib., 254-55 Arch., 16 Test, 485-86	12 Em., 57 Parts, 125 Lib., 253-54 Arch., 15 Test, 484-85	13 Em., 57 Parts, 125 Lib., 252-53 Arch., 15 Test, 483-84	14 Em., 57 Parts, 124-25 Lib., 251-52 Arch., 15 Test, 482	15 Parts, 124 Test, 482
16 Lib., 251 Test, 482	17 Em., 56-57 Parts, 124 Lib., 248-51 Arch., 14-15 Test, 480-82	18 Parts, 123-24 Lib., 247-48 Arch., 14 Test, 479-80	19 Em., 56 Parts, 123 Lib., 245-47 Test, 479	20 Em., 56 Parts, 123 Lib., 244-45 Test, 477-79	21 Em., 56 Lib., 243-44 Test, 476-77	22
23	24 Lib., 241-43 Test, 475-76	25 Parts, 123 Lib., 239-41 Test, 475	26 Lib., 238-39 Test, 474-75	27 Lib., 236-38 Test, 472-74	28 Lib., 235-36 Test, 471-72	29
30 Test, 471						

- 43 -

LG Ex. 1037, pg 45

July 2002

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	1 Lib., 235 Arch., 14 Test, 469-471 1st Triangle	2 Lib., 233-35 Arch., 14 Test, 468-69	3 Em., 56 Lib., 232-33 Arch., 14 Test, 467-68	4 Lib., 231-32	5 Em., 56 Lib., 230-31 Test, 467	6
7	8 Em., 56 Lib., 228-30 Arch., 13-14 Test, 467	9 Em., 55 Parts, 123 Lib., 227-28 Arch., 13 Test, 466-67	10 Em., 54-55 Parts, 122 Lib., 226-27 Arch., 13 Test, 463-66	11 Parts, 122-23 Lib., 225-26 Arch., 12-13 Test, 461-63	12 Parts, 122 Lib., 224 Arch., 12 Test, 459-61	13
14 Lib., 224 Test, 459	15 Em., 54 Parts, 122 Lib., 221-24 Arch., 12 Test, 458-59	16 Em., 54 Parts, 122 Lib., 221 Arch., 12 Test, 456-57	17 Em., 54 Parts, 122 Lib., 220-21 Arch., 12 Test, 455-56	18 Parts, 121-22 Lib., 218-20 Arch., 11-12 Test, 454-55	19 Em., 54 Parts, 121 Lib., 217-18 Arch., 11 Test, 453-54	20
21 Test, 453	22 Em., 53 Parts, 120-21 Lib., 215-17 Arch., 11 Test, 452-53	23 Em., 53 Parts, 120 Lib., 214-15 Test, 451-52	24 Parts, 120 Lib., 213-14 Arch., 11 Test, 450-51	25 Parts, 120 Lib., 213 Arch., 11 Test, 449-50	26 Parts, 120 Lib., 212-13 Arch., 11 Test, 449	27
28 Test, 449	29 Em., 53 Parts, 119-20 Lib., 212 Arch., 11 Test, 448-49	30 Em., 53 Parts, 119 Lib., 211-12 Arch., 10 Test, 448	31 Em., 53 Lib., 210-11 Arch., 10 Test, 445-48			

August 2002						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1 Em., 52-53 Lib., 209-10 Arch., 10 Test, 444-45	2 Em., 52 Parts, 119 Lib., 208-09 Arch., 10 Test, 443-44	3
4	5 Em., 52 Parts, 119 Lib., 207-08 Arch., 9-10 Test, 443	6 Em., 52 Parts, 118-19 Lib., 206-07 Arch., 9 Test, 442-43	7 Lib., 206 Arch., 9 Test, 440-41	8 Em., 52 Parts, 118 Lib., 205-06 Arch., 9 Test, 439-40	9 Em., 51-52 Parts, 118 Lib., 204-05 Arch., 9 Test, 437-39	10
11 Lib., 204 Test, 437	12 Em., 51 Parts, 118 Lib., 203-04 Test, 433-37	13 Em., 51 Parts, 118 Lib., 202-03 Arch., 8-9 Test, 432-33	14 Em., 51 Lib., 201-02 Arch., 8 Test, 432	15 Em., 50-51 Parts, 118 Lib., 200-01 Test, 431	16 Em., 50 Parts, 117-18 Lib., 199-200 Test, 430-31	17
18 Lib., 199 Test, 430	19 Em., 50 Parts, 117 Lib., 197-99 Test, 429-30	20 Parts, 117 Lib., 195-97 Test, 428-29	21 Lib., 194-95 Test, 426-28	22 Em., 50 Parts, 117 Lib., 193-94 Test, 425-26	23 Em., 50 Lib., 192-93 Test, 424-25	24 Test, 423-24
25 Lib., 191-92 Test, 423	26 Em., 50 Parts, 116-17 Lib., 189-91 Test, 422-23	27 Em., 49-50 Parts, 116 Lib., 187-89 Arch., 8 Test, 420-22	28 Parts, 116 Lib., 186-87 Test, 419-20	29 Em., 49 Parts, 116 Lib., 184-86 Test, 417-19	30 Em., 49 Parts, 116 Lib., 183-84 Arch., 8 Test, 415-17	31 Lib., 183 Test, 415

September 2002

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
1	2 Parts, 115-16 Lib., 182-83	3 Em., 49 Parts, 115 Lib., 181-82 Test, 414-15	4 Em., 48-49 Lib., 180-81 Test, 413-14	5 Em., 48 Parts, 115 Lib., 179-80 Test, 411-13	6 Em., 48 Parts, 115 Lib., 177-79 Test, 410-11	7
8	9 Em., 47-48 Parts, 115 Lib., 176-77 Test, 408-10	10 Em., 47 Parts, 115 Lib., 174-76 Arch., 8 Test, 407-08	11 Em., 47 Parts, 114-15 Lib., 173-74 Test, 405-07	12 Parts, 114 Lib., 172-73 Test, 404-05	13 Parts, 114 Lib., 171-72 Arch., 8 Test, 403-04	14
15 Parts, 114 Lib., 171	16 Parts, 114 Lib., 170-71 Arch., 8 Test, 402-03	17 Parts, 113-14 Lib., 169-70 Test, 400-01	18 Parts, 113 Lib., 167-69 Test, 399-400	19 Lib., 166-67 Test, 397-99	20 Parts, 113 Lib., 165-66 Test, 393-97	21 Test, 393
22 Lib., 165	23 Parts, 113 Lib., 164-65 Test, 392-93	24 Parts, 113 Lib., 162-63 Test, 392	25 Em., 47 Parts, 112-13 Lib., 161-62 Test, 390-92	26 Em., 47 Parts, 112 Lib., 160-61 Test, 389-90	27 Em., 46 Parts, 112 Lib., 159-60 Test, 389	28 Parts, 112
29 Lib., 159 Test, 389	30 Em., 46 Parts, 112 Lib., 158-59 Test, 388-89					

October 2002						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
		1 Em., 46 Parts, 111 Lib., 157-58 Test, 386-88	2 Em., 46 Parts, 111 Lib., 156-57 Test, 385-86	3 Em., 46 Parts, 111 Lib., 155-56 Test, 384-85	4 Em., 45 Parts, 111 Lib., 155 Test, 383-84	5 Lib., 154
6 Lib., 154 Test, 382-383	7 Parts, 110-11 Lib., 154 Arch., 8 Test, 381-82	8 Em., 45 Parts, 110 Lib., 152-53 Test, 378-81	9 Em., 45 Parts, 110 Lib., 151-52 Test, 376-78	10 Em., 45 Parts, 110 Lib., 150-51 Test, 373-75	11 Em., 44-45 Lib., 149-50 Test, 373-75	12
13 Parts, 110	14 Em., 44 Parts, 110 Lib., 149 Test, 372-73	15 Em., 44 Parts, 110 Lib., 147-48 Test, 370-72	16 Em., 44 Parts, 109-10 Lib., 146-47 Test, 369-70	17 Em., 44 Parts, 109 Lib., 146 Test, 368-69	18 Em., 44 Parts, 109 Lib., 144-46 Test, 365-68	19 Lib., 144
20 Lib., 144	21 Em., 43 Lib., 143-44 Test, 362-65	22 Em., 43 Lib., 142-43 Test, 361-62	23 Em., 43 Lib., 141-42 Test, 360-61	24 Em., 43 Parts, 109 Arch., 7 Test, 358-60	25 Em., 42-43 Parts, 109 Lib., 139-40 Test, 357-58	26 Parts, 108-09
27 Lib., 139 Test, 357	28 Em., 42 Lib., 138-39 Test, 356-57	29 Em., 42 Parts, 108 Lib., 137-38 Test, 354-56	30 Em., 42 Parts, 108 Lib., 136-37 Test, 354	31 Em., 42 Parts, 108 Lib., 134-36 Test, 352-53		

November 2002

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					1 Em., 41-42 Parts, 108 Lib., 133-34 Test, 351-52	2 Test, 350-51
3 Parts, 108	4 Lib., 131-33 Test, 350	5 Parts, 108 Lib., 130-31 Test, 349-50	6 Em., 41 Parts, 108 Lib., 129-30 Test, 348-49	7 Em., 41 Parts, 107-08 Lib., 129 Test, 347-48	8 Em., 41 Parts, 107 Lib., 127-29 Test, 346-47	9 Lib., 127
10	11 Em., 40-41 Parts, 107 Lib., 126-27 Test, 344-46	12 Parts, 107 Lib., 125-26 Test, 343-44	13 Em., 40 Parts, 106-07 Lib., 123-25 Test, 342-43	14 Em., 40 Parts, 105-06 Lib., 123 Test, 340-42	15 Em., 40 Parts, 105 Lib., 122-23 Test, 338-40	16 Lib., 121-22 Test, 338
17	18 Em., 40 Parts, 105 Lib., 121 Arch., 7 Test, 337-38	19 Em., 39-40 Parts, 105 Lib., 119-21 Test, 335-37	20 Em., 39 Parts, 105 Lib., 118-19 Test, 334-35	21 Em., 39 Parts, 104-05 Lib., 117-18 Test, 332-34	22 Em., 39 Parts, 104 Lib., 116-17 Test, 331-32	23 Parts, 104 Test, 331
24 Lib., 116 Test, 331	25 Parts, 104 Lib., 116 Test, 330-31	26 Em., 39 Parts, 104 Lib., 114-16 Arch., 7 Test, 329-30	27 Parts, 103-04 Lib., 114 Test, 328-29	28 Lib., 114	29 Lib., 113-14 Test, 328	30 Lib., 113

December 2002						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
1 Test, 328	2 Parts, 103 Lib., 112-13 Test, 326-28	3 Em., 39 Parts, 103 Lib., 111-12 Test, 326	4 Em., 38-39 Parts, 103 Lib., 110-11 Test, 324-25	5 Em., 38 Lib., 109-10 Test, 321-24	6 Em., 38 Parts, 103 Lib., 109 Test, 320-21	7 Lib., 109
8 Lib., 108-09	9 Em., 38 Parts, 103 Lib., 108 Test, 319-20	10 Em., 38 Parts, 102-03 Lib., 107-08 Arch., 7 Test, 318-19	11 Em., 38 Parts, 102 Lib., 106-07 Test, 317-18	12 Lib., 106 Test, 316-17	13 Em., 38 Parts, 102 Lib., 105-06 Arch., 7 Test, 315-16	14
15 Lib., 105	16 Em., 37-38 Parts, 102 Lib., 104-05 Test, 313-15	17 Em., 37 Parts, 102 Lib., 104 Arch., 7 Test, 311-13	18 Parts, 102 Lib., 103-04 Test, 309-11	19 Parts, 102 Lib., 102-03 Test, 308-09	20 Parts, 101-02 Lib., 101-02 Arch., 7 Test, 307-08	21 Test, 307
22	23 Parts, 101 Lib., 101 Test, 306-07	24 Lib., 101	25	26 Lib., 101 Arch., 7 Test, 306	27 Em., 37 Lib., 101 Test, 306	28
29 Lib., 101	30 Test, 303-06	31 Em., 37 Lib., 101 Test, 302-03				

January 2003

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1 Parts, 101 Lib., 101	2 Em., 37 Parts, 101 Lib., 99-101 Test, 301-02	3 Em., 37 Parts, 101 Lib., 99 Test, 300-01	4 Parts, 101 Lib., 99
5	6 Em., 36-37 Parts, 100-01 Lib., 98-99 Test, 299-300	7 Em., 36 Parts, 100 Lib., 98 Arch., 7 Test, 297-98	8 Em., 36 Parts, 100 Lib., 97-98 Test, 296-97	9 Em., 36 Parts, 99-100 Lib., 97 Test, 295-96	10 Em., 36 Parts, 99 Lib., 96-97 Arch., 6 Test, 287-95	11 Parts, 99 Test, 287
12 Parts, 99 Lib., 96	13 Parts, 99 Lib., 94-96 Test, 286-87	14 Parts, 99 Lib., 94 Test, 285-86	15 Em., 36 Parts, 98-99 Lib., 92-93 Test, 284-85	16 Em., 35-36 Parts, 98 Lib., 92 Test, 283-84	17 Em., 35 Parts, 97-98 Lib., 91-92 Test, 282-83	18 Parts, 97 Test, 281-82
19 Parts, 97	20 Em., 35 Parts, 97 Lib., 90-91 Test, 280-81	21 Em., 35 Parts, 96-97 Lib., 89-90 Test, 280	22 Em., 35 Parts, 96 Lib., 89 Test, 279-80	23 Em., 34-35 Parts, 95-96 Lib., 88 Test, 278-79	24 Em., 34 Parts, 95 Lib., 87-88 Arch., 6 Test, 276-78	25 Parts, 95 Test, 276
26 Parts, 95 Lib., 87	27 Em., 34 Parts, 95 Lib., 86 Test, 275-76	28 Em., 34 Parts, 94-95 Lib., 85-86 Test, 274-75	29 Em., 34 Parts, 94 Lib., 85 Test, 273-74	30 Parts, 94 Lib., 84-85 Lib., 85 Test, 271-73	31 Em., 33-34 Parts, 94 Lib., 83-84 Arch., 6 Test, 270-71	

February 2003

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
						1 Em., 33 Parts, 93-94 Lib., 83
2 Lib., 83	3 Em., 33 Parts, 93 Lib., 82-83 Test, 269-70	4 Em., 33 Parts, 93 Lib., 82 Test, 268-69	5 Em., 33 Parts, 92-93 Lib., 81-82 Arch., 6 Test, 267-68	6 Em., 33 Parts, 92 Lib., 80-81 Arch., 6 Test, 265-67	7 Em., 33 Parts, 92 Lib., 80 Test, 263-65	8 Parts, 92 Lib., 80
9 Parts, 92 Lib., 79	10 Em., 32 Parts, 91-92 Lib., 79 Test, 263	11 Em., 32 Parts, 91 Lib., 78-79 Test, 261-63	12 Lib., 78 Test, 259-61	13 Em., 32 Parts, 91 Lib., 77-78 Test, 257-59	14 Em., 32 Parts, 90 Lib., 77 Test, 256-57	15 Parts, 90
16 Parts, 90	17 Em., 32 Lib., 76-77	18 Em., 31-32 Parts, 90 Lib., 76 Test, 255-56	19 Em., 31 Parts, 89-90 Lib., 74-76 Test, 254-55	20 Parts, 88-89 Lib., 73-74 Test, 252-54	21 Em., 31 Parts, 88 Lib., 73 Test, 250-52	22 Em., 31
23 Lib., 73	24 Em., 31 Parts, 88 Lib., 71-73 Arch., 6 Test, 249-50	25 Em., 31 Parts, 88 Lib., 70-71 Test, 248-49	26 Em., 31 Parts, 87 Lib., 70 Test, 247-48	27 Em., 30-31 Parts, 87 Lib., 69-70 Arch., 6 Test, 246-47	28 Parts, 86-87 Lib., 69 Arch., 6 Test, 245-46	

March 2003

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
						1 Em., 30 Lib., 69
2	3 Em., 30 Parts, 86 Lib., 68-69 Test, 244-45	4 Parts, 86 Lib., 68 Arch., 6 Test, 243-44	5 Em., 30 Parts, 85-86 Lib., 67-68 Test, 241-43	6 Em., 30 Parts, 85 Lib., 67 Test, 240-41	7 Em., 29-30 Parts, 85 Lib., 66-67 Test, 238-40	8
9	10 Em., 29 Parts, 85 Lib., 66 Test, 237-38	11 Parts, 84-85 Lib., 65 Test, 236-37	12 Em., 29 Parts, 84 Lib., 64-65 Test, 235-36	13 Em., 29 Parts, 84 Lib., 63-64 Test, 234-35	14 Parts, 84 Lib., 63 Test, 233-34	15 Test, 233
16	17 Parts, 84 Lib., 63 Test, 233	18 Parts, 83-84 Lib., 62 Test, 232-33	19 Parts, 83 Lib., 61-62 Test, 231-32	20 Em., 29 Parts, 83 Lib., 60-61 Test, 230-31	21 Em., 29 Parts, 83 Lib., 59-60 Test, 229-30	22
23	24 Parts, 83 Lib., 59 Test, 229	25 Parts, 82-83 Lib., 59 Test, 228-29	26 Em., 28-29 Parts, 82 Lib., 58-59 Test, 228	27 Em., 28 Parts, 82 Lib., 57-58 Test, 227-28	28 Em., 28 Parts, 81-82 Lib., 57 Test, 226-27	29
30	31 Em., 28 Parts, 81 Lib., 57 Test, 225-26					

April 2003

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
		1 Parts, 81 Lib., 56-57 Test, 225	2 Em., 27-28 Parts, 81 Lib., 56 Arch., 6 Test, 224	3 Em., 27 Parts, 80-81 Lib., 55 Test, 223-24	4 Em., 27 Parts, 80 Lib., 55 Test, 223	5
6 Test, 222	7 Em., 27 Parts, 80 Lib., 55 Test, 222	8 Parts, 80 Lib., 54-55 Test, 221-22	9 Em., 27 Parts, 80 Lib., 54 Test, 221	10 Em., 27 Parts, 79-80 Lib., 54 Test, 220-21	11 Em., 27 Parts, 79 Lib., 53-54 Test, 219-20	12
13	14 Em., 26 Parts, 79 Lib., 53 Arch., 5 Test, 218-19	15 Em., 26 Parts, 79 Lib., 52-53 Test, 217-18	16 Em., 26 Parts, 78-79 Lib., 52 Test, 216-17	17 Parts, 78 Lib., 51-52 Test, 215-16	18 Em., 26 Parts, 77-78 Lib., 51 Test, 214-15	19 Lib., 51 Test, 214
20 Lib., 51	21 Parts, 77 Lib., 51 Test, 213-14	22 Em., 26 Parts, 77 Lib., 49-51 Test, 213	23 Em., 26 Parts, 76-77 Lib., 48-49 Test, 212-13	24 Em., 25-26 Parts, 76 Lib., 47-48 Test, 211-12	25 Em., 25 Parts, 76 Lib., 47 Arch., 5 Test, 211	26
27	28 Parts, 75-76 Lib., 47 Test, 211	29 Parts, 75 Lib., 47 Test, 210-11	30 Em., 25 Parts, 74-75 Lib., 46 Test, 208-09			

May 2003

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1 Parts, 73-74 Lib., 45-46 Test, 207-08	2 Parts, 73 Lib., 45 Test, 203-07	3
4	5 Em., 25 Parts, 72-73 Lib., 45 Test, 202-03	6 Em., 24 Parts, 72 Lib., 44-45 Arch., 5 Test, 201-02	7 Em., 24 Parts, 72 Lib., 44 Test, 200-01	8 Em., 24 Parts, 71-72 Lib., 43-44 Arch., 5 Test, 199-200	9 Em., 24 Parts, 71 Lib., 43 Test, 198-99	10 Parts, 71
11	12 Em., 24 Parts, 71 Lib., 42-43 Test, 197	13 Em., 24 Parts, 70-71 Lib., 42 Test, 196-97	14 Parts, 69-70 Lib., 41-42 Test, 195-96	15 Parts, 69 Lib., 40-41 Test, 195	16 Parts, 69 Lib., 40 Test, 194	17 Lib., 40
18	19 Parts, 69 Lib., 39-40 Test, 193-94	20 Em., 24 Parts, 69 Lib., 39 Test, 192-93	21 Parts, 68-69 Lib., 38-39 Test, 192	22 Parts, 67-68 Lib., 38 Test, 190-92	23 Parts, 67 Lib., 37-38 Test, 189-90	24
25	26 Lib., 37	27 Lib., 36-37 Test, 189	28 Parts, 67 Lib., 36 Test, 187-89	29 Parts, 67 Lib., 35-36 Test, 187	30 Em., 24 Parts, 66-67 Lib., 35 Test, 186	31

- 54 -

LG Ex. 1037, pg 56

June 2003

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
1	2 Em., 24 Lib., 34-35 Test, 185-86	3 Em., 23-24 Parts, 66 Lib., 34 Arch., 5 Test, 184-85	4 Em., 23 Parts, 65-66 Lib., 34 Test, 183-84	5 Parts, 65 Lib., 33-34 Arch., 5 Test, 182-83	6 Parts, 64-65 Lib., 32 Arch., 4 Test, 181-82	7 Parts, 64
8 Parts, 64	9 Em., 23 Parts, 64 Lib., 32 Arch., 4 Test, 180-81	10 Em., 23 Parts, 63-64 Lib., 31-32 Arch., 4 Test, 180	11 Em., 22 Parts, 63 Lib., 31 Arch., 4 Test, 179	12 Em., 22 Parts, 62-63 Lib., 30-31 Test, 178-79	13 Em., 22 Parts, 62 Arch., 3-4 Test, 178	14 Parts, 62
15	16 Em., 22 Parts, 61-62 Lib., 29-30 Arch., 3 Test, 177-78	17 Em., 21-22 Parts, 61 Lib., 28-29 Arch., 3 Test, 176-77	18 Em., 21 Parts, 61 Lib., 28 Arch., 3 Test, 175-76	19 Em., 21 Parts, 60-61 Lib., 28 Test, 175	20 Parts, 60 Lib., 28 Test, 174-75	21
22 Parts, 60	23 Em., 21 Lib., 27-28 Test, 173-74	24 Em., 21 Parts, 59-60 Lib., 26-27 Arch., 3 Test, 172-73	25 Em., 21 Parts, 59 Lib., 26 Test, 171-72	26 Em., 20-21 Parts, 58-59 Lib., 26 Test, 169-71	27 Em., 20 Parts, 58 Lib., 25-26 Test, 169	28
29	30 Em., 20 Parts, 57-58 Lib., 25 Test, 168-69					

July 2003						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
		1 Parts, 57 Lib., 24-25 Arch., 3 Test, 167-68	2 Parts, 57 Lib., 23-24 Test, 166-67	3 Parts, 57 Lib., 23 Test, 166	4 Lib., 23	5 Test, 165
6 Lib., 23	7 Parts, 56-57 Lib., 23 Test, 165	8 Em., 20 Parts, 56 Lib., 22-23 Test, 164-65	9 Parts, 55-56 Lib., 22 Test, 163-64	10 Em., 20 Parts, 55 Lib., 22 Arch., 2-3 Test, 161-63	11 Parts, 55 Lib., 22 Test, 159-61	12 Parts, 54-55 Test, 159
13	14 Em., 20 Parts, 54 Lib., 21-22 Test, 157-59	15 Parts, 53-54 Lib., 20-21 Arch., 2 Test, 156-57	16 Em., 20 Parts, 53 Lib., 20 Test, 154-56	17 Parts, 52-53 Lib., 20 Test, 153-54	18 Em., 19 Parts, 52 Lib., 19-20 Test, 153	19 Parts, 51-52
20	21 Em., 19 Parts, 51 Lib., 19 Test, 151-53	22 Em., 19 Parts, 51 Lib., 18-19 Test, 150-51	23 Em., 19 Parts, 51 Lib., 17-18 Test, 148-50	24 Parts, 51 Lib., 17 Test, 147-48	25 Parts, 50-51 Lib., 17 Test, 146-47	26
27 Test, 145-46	28 Em., 19 Parts, 50 Lib., 17 Test, 145	29 Em., 19 Lib., 16 Test, 144-45	30 Em., 18-19 Parts, 50 Lib., 16 Arch., 2 Test, 143-44	31 Em., 18 Parts, 49-50 Lib., 15-16 Test, 142-43		

August 2003						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					1 Parts, 49 Lib., 15 Arch., 2 Test, 142	2
3	4 Parts, 49 Lib., 14 Test, 140-42	5 Em., 18 Parts, 49 Lib., 14 Arch., 2 Test, 140	6 Parts, 48-49 Lib., 14 Test, 139-40	7 Em., 18 Parts, 48 Lib., 13-14 Test, 138-39	8 Em., 18 Parts, 47-48 Lib., 13 Test, 137-38	9
10 Parts, 47	11 Parts, 47 Lib., 13 Arch., 2 Test, 136-37	12 Lib., 12-13 Arch., 2 Test, 135-36	13 Em., 18 Parts, 47 Lib., 12 Arch., 2 Test, 134-35	14 Lib., 12 Test, 133-34	15 Parts, 46-47 Lib., 11-12 Test, 133	16
17	18 Parts, 46 Lib., 10-11 Test, 133	19 Em., 18 Test, 132-33	20 Em., 17-18 Parts, 46 Lib., 10 Test, 130-32	21 Arch., 2 Em., 17 Parts, 46 Lib., 10 Test, 129-30	22 Em., 17 Parts, 46 Test, 127-29	23
24	25 Parts, 46 Lib., 9 Test, 127	26 Em., 17 Parts, 45-46 Test, 125-26	27 Em., 16-17 Parts, 45 Lib., 9 Arch., 1-2 Test, 124-25	28 Em., 16 Parts, 44-45 Lib., 8 Arch., 1 Test, 124	29 Parts, 44 Lib., 8 Test, 123-24	30 Parts, 44
31						

September 2003

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	1 Parts, 44 Test, 122	2 Parts, 44 Lib., 8-9 Test, 121-22	3 Parts, 44 Lib., 8-9 Test, 121-22	4 Parts, 44 Lib., 8 Test, 120-21	5 Em., 16 Parts, 43-44 Lib., 7-8 Test, 119-20	6 Parts, 43 Test, 118-19
7 Test, 118	8 Em., 16 Parts, 43 Lib., 7 Test, 117-18	9 Em., 16 Parts, 43 Lib., 7 Test, 115-17	10 Em., 16 Parts, 42-43 Lib., 7 Test, 113-15	11 Em., 15-16 Parts, 42 Lib., 7 Test, 112-13	12 Parts, 42 Test, 111-12	13 Parts, 41-42
14 Parts, 41 Test, 110-11	15 Parts, 41 Lib., 6-7 Test, 109-10	16 Em., 15 Parts, 41 Lib., 6 Arch., 1 Test, 107-09	17 Em., 15 Parts, 41 Lib., 6 Test, 106-07	18 Lib., 6 Test, 104-05	19 Test, 102-04	20 Parts, 40 Test, 102
21 Test, 101	22 Parts, 39-40 Lib., 6 Test, 99-101	23 Em., 15 Parts, 39 Lib., 5-6 Test, 97-99	24 Em., 15 Parts, 39 Lib., 5 Test, 95-97	25 Em., 14 Parts, 38-39 Lib., 5 Test, 92-95	26 Em., 14 Parts, 38 Test, 89-92	27
28	29 Em., 14 Parts, 37-38 Lib., 5 Test, 88-89	30 Em., 14 Parts, 37 Lib., 5 Test, 87-88				

October 2003

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1 Em., 14 Parts, 36-37 Lib., 4-5 Test, 85-87	2 Em., 14 Parts, 36 Lib., 4 Test, 83-85	3 Em., 13-14 Parts, 36 Lib., 4 Test, 80-83	4
5	6 Em., 13 Parts, 36 Arch., 1 Test, 80	7 Em., 13 Parts, 35-36 Test, 77-80	8 Em., 13 Parts, 35 Lib., 4 Test, 76-77	9 Em., 13 Parts, 34 Lib., 3-4 Test, 75-76	10 Parts, 34 Lib., 3 Test, 74-75	11
12	13 Em., 13 Parts, 34 Test, 73-74	14 Em., 13 Lib., 3 Test, 72-73	15 Em., 12 Parts, 33 Lib., 3 Test, 70-72	16 Em., 12 Parts, 33 Test, 69-70	17 Parts, 33 Test, 68-69	18
19 Parts, 33	20 Parts, 32-33 Test, 67-68	21 Parts, 32 Lib., 3 Test, 65-66	22 Em., 12 Parts, 32 Lib., 3 Test, 63-65	23 Em., 12 Parts, 32 Test, 61-63	24 Em., 12 Parts, 31 Test, 60-61	25
26 Parts, 31	27 Em., 11 Parts, 30-31 Lib., 3 Test, 59-60	28 Em., 11 Parts, 30 Test, 57-59	29 Em., 11 Parts, 30 Test, 56-57	30 Em., 11 Parts, 30 Lib., 3 Test, 56	31 Em., 11 Test, 55-56	

- 59 -

LG Ex. 1037, pg 61

November 2003

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
						1 Parts, 29
2	3 Em., 11 Parts, 29 Test, 53-55	4 Em., 10-11 Parts, 29 Lib., 2 Test, 51-53	5 Em., 10 Parts, 29 Test, 50-51	6 Em., 10 Parts, 29 Test, 49-50	7 Em., 10 Parts, 28-29 Test, 48-49	8
9	10 Em., 10 Parts, 28 Lib., 2 Test, 47-48	11 Parts, 28 Test, 46-47	12 Parts, 28 Test, 45-46	13 Parts, 27-28 Lib., 2 Test, 44-45	14 Parts, 27 Test, 43-44	15
16 Parts, 27	17 Em., 10 Test, 41-43	18 Parts, 27 Test, 40-41	19 Parts, 26-27 Lib., 2 Test, 39-40	20 Priority Application Filed	21	22
23	24	25	26	27	28	29
30						

- 60 -

LG Ex. 1037, pg 62

[REDACTED]

VI. EXHIBITS

53. The following Exhibits are relevant for this Declaration.

Exhibit Number	Reference
1001	U.S. Patent No. 6,897,871
2007	R400 Sequencer Specification (Version 0.1)
2009	R400 Sequencer Specification (Version 0.3)
2010	R400 Sequencer Specification (Version 0.4)
2011	R400 Sequencer Specification (Version 0.5)
2012	R400 Sequencer Specification (Version 0.6)
2013	R400 Sequencer Specification (Version 0.7)
2014	R400 Sequencer Specification (Version 0.8)
2015	R400 Sequencer Specification (Version 0.9)
2016	R400 Sequencer Specification (Version 1.0)
2017	R400 Sequencer Specification (Version 1.1)
2018	R400 Sequencer Specification (Version 1.2)
2020	R400 Sequencer Specification (Version 1.4)
2021	R400 Sequencer Specification (Version 1.5)
2022	R400 Sequencer Specification (Version 1.6)
2023	R400 Sequencer Specification (Version 1.7)
2024	R400 Sequencer Specification (Version 1.8)
2025	R400 Sequencer Specification (Version 1.9)
2026	R400 Sequencer Specification (Version 1.10)
2027	R400 Sequencer Specification (Version 1.11)
2028	R400 Sequencer Specification (Version 2.0)
2029	R400 Sequencer Specification (Version 2.1)

2030	R400 Sequencer Specification (Version 2.2)
2031	R400 Sequencer Specification (Version 2.3)
2032	R400 Sequencer Specification (Version 2.4)
2033	R400 Sequencer Specification (Version 2.5)
2034	R400 Sequencer Specification (Version 2.6)
2035	R400 Sequencer Specification (Version 2.7)
2036	R400 Sequencer Specification (Version 2.8)
2037	R400 Sequencer Specification (Version 2.9)
2038	R400 Sequencer Specification (Version 2.10)
2039	R400 Sequencer Specification (Version 2.11)
2040	R400 Architecture Proposal (Version 0.1)
2041	R400 Top Level Specification (Version 0.2)
2042	R400 Shader Processor (Version 1.2)
2043	R400 Sequencer Specification Log (Versions 0.1 to 1.2)
2044	R400 Sequencer Specification Log (Versions 1.4 to 2.11)
2045	R400 Architecture Proposal Log
2046	R400 Top Level Specification Log
2047	R400 Shader Processor Log
2048	R400 Sequencer Emulator Folder History
2049	R400 Sequencer Parts Folder History
2050	R400 Document Library Folder History
2051	R400 Architecture Folder History
2052	R400 GFX Testing Folder History
2053	Peter Pellerite Program Review Slides (12/13/01)
2058	Mark Fowler Program Review Slides (3/22/02)
2061	Mark Fowler Program Review Slides (5/30/02)



2066	Peter Pellerite Program Review Slides (8/30/02)
2072	R400 Shader Pipe Parts Folder History
2097	RTL Code File: sq_thread_arb.v

- 63 -

LG Ex. 1037, pg 65

[REDACTED]

I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true. The statements in this declaration were made with the knowledge that willful false statements and the like are made punishable by fine or imprisonment under Section 1001 of Title 18 of the United States Code and that willful false statements may jeopardize the validity of the '871 patent.

Executed this 9th day of October 2015 in Montreal, Quebec, Canada.

Respectfully submitted,

/Laurent Lefebvre/
Laurent Lefebvre