

# Exhibit A



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CORPORATE

### Two Latest Developments in Our Patent Dispute with Samsung

By [David Shannon](#) on April 16, 2015

We said we'd keep you updated on the progress of our patent dispute against Samsung, so let me share with you several recent developments.

Let's start with a quick recap.

Back in September, in the first IP lawsuit NVIDIA has initiated since our founding more than two decades ago, [we sued](#) Samsung and Qualcomm in the U.S. International Trade Commission and the U.S. District Court in Delaware for using our GPU patents without fairly compensating us. (See a fuller description of the cases [here](#) and [here](#).)

Our case in the ITC is scheduled for hearing in late June 2015, and we got a positive sign earlier this month in a [pretrial decision](#) - known as a Markman ruling - in which the presiding judge ruled in favor of NVIDIA's preferred construction of nearly all of the disputed language in our claims. In this case, we're asking the U.S. to block imports of certain Galaxy phones and tablets - including Samsung's newly shipping Galaxy S6 and Edge - into the U.S.

Samsung had subsequently [sued us](#) in the ITC, as well as in U.S. District Court in Virginia - known as the "rocket docket" for its very fast time to trial.

Two things have happened in recent days that are worth being aware of.

Case 3:14-cv-00757-REP-DJN Document 101-1 Filed 04/22/15 Page 3 of 5 PageID# 15391 beyond the seven cited in the ITC and Delaware cases. (The four patents are described in our latest filing [here](#).) These newly asserted patents in our countersuit are scheduled to be decided at the same time as Samsung's case against us.

And, second, U.S. District Judge Robert E. Payne has set a date of Jan. 11, 2016, for the trial to begin in Virginia. This will focus on Samsung's asserted six patents against NVIDIA, and two patents against our customer Velocity Micro, as well as on our four patents asserted against Samsung.

NVIDIA has spent more than \$9 billion in R&D since 1993 when we began to create what is now 7,000 patent assets comprising the richest portfolio of graphics IP in the world. Our IP strategy is to earn an appropriate return on our investment by licensing our graphics cores or by licensing our patents. Samsung's unwillingness to negotiate forced us to go to the courts.

There will likely be more legal back and forth in the months ahead in these very important cases, and we'll do our best to keep you informed.

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

Plaintiffs,

-v.-

NVIDIA CORPORATION, VELOCITY  
MICRO, INC. D/B/A VELOCITY MICRO,  
AND VELOCITY HOLDINGS, LLC,

Defendants.

Civil Action No. 3:14-cv-757-REP

**DEFENDANTS' MOTION FOR LEAVE TO FILE ANSWERS AND COUNTERCLAIMS  
TO THE SECOND AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15(a)(2), NVIDIA Corporation ("NVIDIA")  
and Old Micro, Inc. F/K/A Velocity Micro, Inc., and Velocity Holdings, LLC ("Velocity")



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Steve · 15 hours ago

Thanks for keeping us informed on the case(s).

It is nice to see the actual documentation and a point by point response that is detailed. That sure beats the FUD being spread by the usual haters.

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domahman · a day ago

Skimming through 2 thousand pages is tough. They should invalidate most of Samsungs patent... such generic copycats.

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Steve > domahman · 15 hours ago

Nvidia's defense:

First Defense: (Non Infringement) pg 798

Second Defense: (Invalidity) pg 799

Third Defense: (Waiver, Laches, Estoppel) pg 810

Fourth Defense: (Express or Implied License, Patent Exhaustion) pg 811

Fifth Defense: (Prosecution History Estoppel, Prosecution Disclaimer) pg 812

Sixth Defense: (Limitations of Damages) pg 812

Eighth Defense: (Breach of Contract) pg 813

Ninth Defense: (Unclean Hands) pg 813

Tenth Defense: (Equitable/Promissory Estoppel) pg 814

Eleventh Defense: (Statute of Limitations) pg 814

Twelfth Defense: (Other) pg 814

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**Red.Dot.Mist** • 3 days ago

I doubt many of your customers are happy about this suit.

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**roger** > Red.Dot.Mist • a day ago

Looks more like AMD customers aren't happy about this. Nvidia aren't patent trolls and they should defend their rich portfolio of patents when they need to. It's about time they did something like this.

2 □ | □ • Reply • Share ›



**odizzido** > Red.Dot.Mist • 2 days ago

They don't care what their customers think. Well, not until it threatens their profits which is all that matters to them.

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