

**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, OLD MICRO,  
INC. F/K/A VELOCITY MICRO, INC., AND  
VELOCITY HOLDINGS, LLC

Defendants.

CIVIL ACTION NO. 3:14-cv-00757-REP

JURY TRIAL DEMANDED

**SAMSUNG'S MOTION TO SEVER NVIDIA'S PATENT INFRINGEMENT  
COUNTERCLAIMS**

Plaintiffs Samsung Electronics Co., Lt. and Samsung Electronics America, Inc. (collectively, "Samsung"), by counsel, respectfully move to sever the patent infringement counterclaims (Counts I - IV) filed by Defendant NVIDIA Corporation ("NVIDIA") on April 16, 2015 (Dkt. No. 87). The grounds for this motion are set out in the Memorandum in support of this motion and the Declaration of Sarah K. McConaughy, which are filed herewith.

Samsung respectfully requests that the Court grant this motion and enter an Order granting this motion.

Respectfully submitted,

SAMSUNG ELECTRONICS CO., LTD.  
SAMSUNG ELECTRONICS AMERICA, INC.  
By Counsel

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### CERTIFICATE OF SERVICE

I hereby certify that on April 24, 2015, a true and correct copy of the foregoing was filed electronically using the CM/ECF system. As such, this document was served on all counsel who have consented to electronic service, including as follows:

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