

Plaintiffs,

JURY TRIAL DEMANDED

v.

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

Defendants.

**DECLARATION OF SARAH K. MCCONAUGHY IN SUPPORT OF SAMSUNG'S
MOTION TO SEVER NVIDIA'S PATENT INFRINGEMENT COUNTERCLAIMS**

I, Sarah K. McConaughy, declare as follows:

1. I am a member of the Bar of the Commonwealth of Virginia and am admitted to the United States District Court for the Eastern District of Virginia. I am an attorney at the law firm of McGuireWoods, LLP, attorneys of record for Plaintiffs Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc., (collectively "Samsung") in this case. I submit this declaration in support of Samsung's Opposition to Defendants' Motion for Extension of Time to Answer or Otherwise Respond to the Complaint. I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would do so under oath.

2. Attached hereto as Exhibit 1 is a true and correct copy of a webpage titled, "Two Latest Developments in Our Patent Dispute with Samsung," which can be accessed at <http://blogs.nvidia.com/blog/2015/04/16/update-patent-samsung/> (last accessed on April 24, 2015).

3. Attached hereto as Exhibit 2 is a true and correct copy of Order 18: Granting Unopposed Motion to Amend Procedural Schedule, *In the Matter of Certain Consumer*

“NVIDIA Receives Favorable Ruling from ITC in Patent Dispute with Samsung, Qualcomm,” which can be accessed at <http://blogs.nvidia.com/blog/2015/04/06/itc-favorable-ruling/> (last accessed on April 24, 2015).

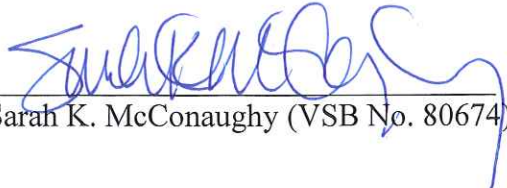
5. Attached hereto as Exhibit 4 is a true and correct copy of NVIDIA’s Second Set of Requests for Production of Documents and Things to Samsung (Nos. 48-110), dated April 14, 2015.

6. Attached hereto as Exhibit 5 a true and correct copy of NVIDIA’s Second Set of Interrogatories to Samsung (Nos. 3-6), dated April 14, 2015.

7. Attached hereto as Exhibit 6 is a true and correct copy of an April 14, 2009 Order in, *ROY-G-BIV Corp. v. FANUC Ltd., et al.*, Case No. 2:07-CV-418 (E.D. Tex.).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed April 24, 2015 in Norfolk, Virginia.


Sarah K. McConaughy (VSB No. 80674)

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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