

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

SAMSUNG ELECTRONICS CO., LTD.)	
et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:14CV757-REP
)	
NVIDIA CORPORATION,)	
et al.,)	
)	
Defendants.)	

**NVIDIA’S SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS
AND THINGS TO SAMSUNG (NOS. 48-110)**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant NVIDIA Corporation (“Defendant”), requests that Plaintiffs Samsung Electronics Company, Ltd. and Samsung Electronics America, Inc. respond to these requests in writing, in accordance with the definitions and instructions contained herein, and produce all documents and things in Samsung’s possession, custody, or control that are requested below, within thirty (30) days after service pursuant to the Federal Rules of Civil Procedure, and at the office of Latham & Watkins LLP, 555 11th Street NW, Suite 1000, Washington, DC 20004, or at such other time and place as the parties may agree upon.

DEFINITIONS

As used herein and in all further Interrogatories, unless specified otherwise, the following definitions apply:

1. “Samsung,” “Plaintiff,” “You,” or “Your” means Samsung Electronics Company, Ltd. and Samsung Electronics America, Inc. and all parents, subsidiaries, and affiliates thereof, all divisions, predecessors-in-interest, successors, and assigns of each of the foregoing, and all principals, officers, investors, employees, directors, agents, consultants, attorneys, and all other persons acting or purporting to act on behalf of or under the control of any of the foregoing.

2. “Defendants” means NVIDIA Corporation, Velocity Micro, Inc., and Velocity Holdings, LLC and their officers, directors, agents, representatives, employees, attorneys, and investigators, and others acting on their behalf.

3. References to this “lawsuit,” “case,” or “action” mean the above-captioned action brought by Samsung.

4. “The ’158 Patent” means U.S. Patent No. 5,860,158—including any reexamination certificate and certificate of correction.

5. “The ’938 Patent” means U.S. Patent No. 6,262,938—including any reexamination certificate and certificate of correction.

6. “The ’902 Patent” means U.S. Patent No. 6,287,902—including any reexamination certificate and certificate of correction.

7. “The ’602 Patent” means U.S. Patent No. 6,819,602—including any reexamination certificate and certificate of correction.

8. “The ’675 Patent” means U.S. Patent No. 8,252,675—including any reexamination certificate and certificate of correction.

9. “The ’724 Patent” means U.S. Patent No. 6,804,724—including any

reexamination certificate and certificate of correction.

10. “The ’054 Patent” means U.S. Patent No. 7,073,054—including any reexamination certificate and certificate of correction.

11. “The ’854 Patent” means U.S. Patent No. 5,777,854—including any reexamination certificate and certificate of correction.

12. “Samsung-Patents-In-Suit” means the ’158 Patent, the ’938 Patent, the ’902 Patent, the ’602 Patent, the ’675 Patent, the ’724 Patent, the ’054 Patent, and the ’854 Patent, collectively, any other patent that may be added to this litigation by Samsung in amended pleadings, and the applications that lead to any of the foregoing patents. Any Interrogatory referring to “Patent-In-Suit” or “Patents-In-Suit” seeks information as to each and every one of the Samsung-Patents-In-Suit.

13. “Asserted Samsung Claim(s)” means each claim of the Samsung-Patents-In-Suit that Samsung asserts one or more Defendants infringe, either directly or indirectly, literally or by the doctrine of equivalents.

14. “Named Samsung Inventors” refers to the persons named as inventors on the face of the Patents-In-Suit, including Jung-bae Lee, Choong-sun Shin, Dong-yang Lee, Du-hyung Kim, Seong-young Seo, Jung-bae Lee, Byong-mo Moon, Jongwon Lee, Boun Yoon, Sang Yeob Han, Chae Lyoung Kim, Randall S. Welch, Bao Gia Le, Yet-Ping Pai, Le T. Nguyen, Seung-Gi Shin, In-soo Kim, and Kyung-young Kim.

15. “Samsung File history” means the United States Patent and Trademark Office (“PTO”) records of all communications and all documents and things sent between the PTO and the patent applicant(s) in connection with the prosecution of the Samsung-Patents-In-Suit.

16. “Samsung Foreign Counterpart Application” means any patent application filed

anywhere in the world outside the United States (i) that claims priority in whole or in part from an application that resulted in a given patent; (ii) that is the basis for the claim of priority in whole or part (including without limitation claims of benefits under 35 U.S.C. §§ 119(e) or 120) for a given patent; or (iii) that discloses the same subject matter as a given patent.

17. “Related Samsung Application” means any parent or ancestral application related in any way to a given patent and any continuing application, continuation-in-part application, divisional application, file-wrapper continuation, reexamination proceeding, reissue application, abandoned application or foreign counterpart application for that patent.

18. “Related Samsung Patent” means any patent that issued from any Related Samsung Application.

19. “The ’590 Patent” means U.S. Patent No. 7,339,590—including any reexamination certificate and certificate of correction.

20. “The ’414 Patent” means U.S. Patent No. 7,095,414—including any reexamination certificate and certificate of correction.

21. “The ’013 Patent” means U.S. Patent No. 6,532,013—including any reexamination certificate and certificate of correction.

22. “The ’531 Patent” means U.S. Patent No. 8,174,531—including any reexamination certificate and certificate of correction.

23. “NVIDIA-Patents-In-Suit” means the ’590 Patent, ’414 Patent, ’013 Patent and ’531 patent, collectively, any other patent that may be added to this litigation by NVIDIA in amended pleadings, and the applications that lead to any of the foregoing patents. Any Interrogatory referring to “NVIDIA-Patent-In-Suit” seeks information as to each and every one of the NVIDIA-Patents-In-Suit.

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