

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

SAMSUNG ELECTRONICS CO., LTD., *et*)
al.,)
)
Plaintiffs,)
)
v.)
)
NVIDIA CORPORATION, *et al.*,)
)
Defendants.)

Civil No. 3:14cv757 (REP)(DJN)

JURY TRIAL DEMANDED

**DEFENDANTS' MOTION IN LIMINE NO. 1 TO PRECLUDE PLAINTIFFS' EXPERT
DR. MADISSETTI FROM PROVIDING CERTAIN OPINIONS UNDISCLOSED IN HIS
EXPERT REPORTS**

Defendants NVIDIA Corporation (“NVIDIA”), Velocity Micro, Inc. d/b/a Velocity Micro, and Velocity Holdings, LLC (“Defendants”) respectfully move the Court *in limine* to preclude Plaintiffs Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc.’s technical expert as to U.S. Patents Nos. 6,262,938 (“the ’938 patent”) and 6,819,602 (“the ’602 patent”), Dr. Vjay Madiseti, from providing certain testimony regarding opinions and bases not disclosed in his expert reports, including:

1. Any opinion that the additional limitations of claims 27-29 of the ’602 patent are met under the doctrine of equivalents;
2. Any opinion that certain limitations of the ’938 patent are met under the doctrine of equivalents;
3. Any opinion as to the values that are set in registers that disable circuitry accused of infringing the ’602 patent;
4. Any opinion regarding the nexus between the ’938 patent and the commercial success of inventions allegedly embodying the ’938 patent;
5. Any opinion on secondary considerations of non-obviousness with respect to the ’602 patent besides commercial success and copying by others; and
6. Any opinion regarding NVIDIA’s use of dynamic voltage/frequency scaling in the accused products.

The grounds and authority in support of this motion are set forth in the accompanying Memorandum in Support of Defendants’ Motion *in Limine*, and the exhibits thereto.

Dated: November 10, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of November, 2015, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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