

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

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

Plaintiffs,

-vs.-

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 TO FILE DOCUMENTS UNDER SEAL

Defendants, by counsel, hereby move the Court to file under seal their unredacted Memorandum in Support of Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a), Sever, and Stay and the unredacted Declaration of Randall Copeland attached to that Memorandum. In support of this Motion, Defendants submit contemporaneously herewith a nonconfidential Memorandum in Support of Motion to File Documents Under Seal, along with a proposed Order.

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

By: _____ /s/ _____
Of Counsel

Dabney J. Carr, IV, VSB No. 28679
dabney.carr@troutmansanders.com
Robert A. Angle, VSB No. 37691
robert.angle@troutmansanders.com
TROUTMAN SANDERS LLP
1001 Haxall Point
Richmond, VA 23219
T: (804) 697-1200
F: (804) 697-1339

Clement J. Naples (admitted *pro hac vice*)
clement.naples@lw.com
LATHAM & WATKINS LLP
885 Third Avenue
New York, NY 10022-4834
Tel: (212) 906-1200; Fax: (212) 751-4864

Counsel for NVIDIA Corporation
Velocity Micro, Inc. d/b/a Velocity Micro
and Velocity Holdings, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of January, 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:

Robert W. McFarland
rmcfarland@mcguirewoods.com
Sarah K. McConaughy
smcconaughey@mcguirewoods.com
McGuire Woods LLP
101 W. Main Street, Suite 9000
Norfolk, VA 23510

Sean F. Murphy
sfmurphy@mcguirewoods.com
McGuireWoods LLP
1750 Tysons Boulevard, Suite 1800
Tysons Corner, VA 22102-4215

Counsel for Samsung Electronics Co., Ltd. and
Samsung Electronics America, Inc.

Darin W. Snyder
dsnyder@omm.com
Alexander B. Parker
aparker@omm.com
Elysa Q. Wan
ewan@omm.com
O'Melveny & Myers LLP
Two Embarcadero Center, 28th Floor
San Francisco, CA 94111

Vision L. Winter
vwinter@omm.com
Ryan K. Yagura
ryagura@omm.com
Michael A. Koplow
O'Melveny & Myers LLP
400 South Hope Street, 18th Floor
Los Angeles, CA 90071

Mishima Alam
malam@omm.com
O'Melveny & Myers LLP
1625 Eye Street NW
Washington, DC 20006

/s/
Dabney J. Carr, IV (VSB No. 28679)
dabney.carr@troutmansanders.com
Robert A. Angle (VSB No. 37691)
robert.angle@troutmansanders.com
TROUTMAN SANDERS LLP
1001 Haxall Point
Richmond, VA 23219
Telephone: (804) 697-1200
Facsimile: (804) 697-1339

