

**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

**DECLARATION OF DAVID LUEBKE IN SUPPORT OF
DEFENDANT NVIDIA CORPORATION'S MOTION TO TRANSFER VENUE
PURSUANT TO 28 U.S.C. § 1404(a), SEVER, AND STAY**

I, David Luebke, declare:

1. I am a full-time employee of NVIDIA Corporation ("NVIDIA"), where I hold the position of Senior Director of Research Staff within the Computer Graphics Research Group. I have held that position since March of 2012. I have been employed with NVIDIA since 2006. The statements in this declaration are based upon my personal knowledge, corporate records, information maintained by NVIDIA in the ordinary course of business, or reasonable investigation, and I could and would testify competently to these matters if called upon to do so.

2. I understand that Plaintiffs have sued NVIDIA and accused NVIDIA of infringing U.S. Patent Nos. 5,860,158; 6,262,938; 6,287,902; 6,819,602; 8,252,675; and 6,804,724 based on its manufacture, use, sale, offer for sale, or importation of products, including without limitation

Graphic Processing Units (“GPUs”), system-on-a-chip units (“SOCs”), and graphics cards that allegedly practice the inventions of the asserted patents.

3. NVIDIA has a small regional office located at 410 East Water Street, Suite 200 Charlottesville, VA 22902.

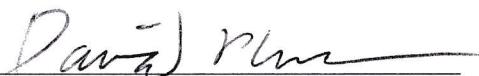
4. There are three employees, including myself, who work in the Charlottesville office.

5. To my knowledge after a reasonable investigation, none of the NVIDIA employees in the Charlottesville office do any substantive work related to the design, development, or manufacture of the accused products, or has ever sold any of the accused devices, or works on any marketing or financial reporting of the accused products.

6. In addition to the employees who work in the Charlottesville office, there are nine NVIDIA employees who work from home and reside in Virginia.

7. To my knowledge after a reasonable investigation, none of the NVIDIA employees who work from home and reside in Virginia do any substantive work related to the design, development, or manufacture of the accused products, or has ever sold any of the accused devices, or works on any marketing or financial reporting of the accused products.

I declare under the penalty of perjury that the forgoing is true and correct. Executed this 11th day of January, 2015 in Charlottesville, Virginia.



David Luebke