

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

I, Philip Decker, declare:

1. I am a full-time employee of NVIDIA Corporation ("NVIDIA"), where I hold the position of Senior Director of Information Security.
2. I work at NVIDIA's headquarters located at 2701 San Tomas Expressway, Santa Clara, California 95050.
3. I reside in Santa Clara, California.
4. I joined NVIDIA as an employee in 2000 in the Information Technology Department. I assumed the position of Director of Information Security in 2002. In 2006, I assumed my current position as Senior Director of Information Security. In that role, I am a member of the Legal organization, and am involved in creating, reviewing and managing

5. NVIDIA's document retention, backup, and storage policies and practices are formulated and managed by the legal and IT organizations, which are based at NVIDIA's headquarters in Santa Clara, California.

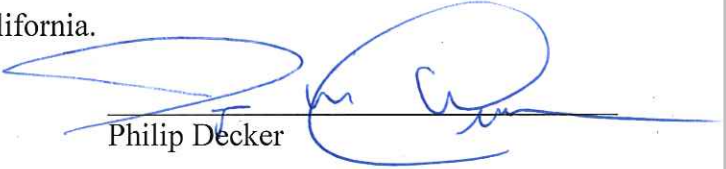
6. Together with other members of my organization, I expect to be involved in NVIDIA's obligations to gather and produce evidence in this matter, as I am in other substantially similar lawsuits filed against NVIDIA.

7. Based on the Amended Complaint, it is my understanding that Plaintiffs accuse 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 graphic cards that allegedly practice the inventions of the asserted patents. I also understand that another defendant, Velocity, is accused of infringing these patents based on its use, sale, offer for sale, or importation of products that employ components that allegedly practice the inventions of the asserted patents, such as NVIDIA's GPUs and SOC's. Based on these facts, I expect the universe of documents from which NVIDIA may potentially have to produce to be extremely voluminous.

8. To my knowledge, almost all of the evidence and/or documents relevant to the matters described in the Amended Complaint are located in Northern California. To my knowledge, no such evidence is maintained in Virginia.

and less disruptive to my business and personal affairs than litigation in Virginia. It would also be disruptive to my organization to have people under my supervision and with whom I work coordinating document management issues on the other side of the country when all relevant documents and resources for obtaining them are in Northern California.

I declare under the penalty of perjury that the forgoing is true and correct. Executed this 9th day of January, 2015 in Santa Clara, California.


Philip Decker