

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

I, Richard Calderwood, declare:

1. I am a full-time employee of NVIDIA Corporation ("NVIDIA"), where I hold the position of Director of Intellectual Property. I have personal knowledge of the matters stated herein, and I could and would testify competently to these matters if called upon to do so.

2. I reside in Portland, Oregon.

3. I joined NVIDIA as an employee on June 25, 2007.

4. I have reviewed Plaintiffs' Amended Complaint against NVIDIA and the patents it has accused NVIDIA of infringing .

5. I understand that Plaintiffs have sued NVIDIA in Virginia and have 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.

6. To my knowledge after a reasonable investigation, the majority of the design and manufacturing efforts by NVIDIA for the devices accused by Plaintiffs in this action have occurred or currently occur in or near Santa Clara, California. None of it occurs in Virginia.

7. Although the litigation has just begun, NVIDIA has identified the following individuals who are likely to be witnesses and may testify at trial about U.S. Patent No. 5,860,158:

- Marc Delvaux, Principal Architect of Mobile Systems
- Shailander Chaudhry, Principal Engineer
- Darrell Boggs, Senior Director of CPU Architecture/the Senior Distinguished Engineer
- Lacky Shah, Senior Director of Architecture
- Jack Choquette, Senior Distinguished Engineer

These likely witnesses work in Santa Clara except for Mr. Boggs who works in Oregon. Proceedings in the Northern District of California would be far more convenient for these likely witnesses than proceedings in the Eastern District of Virginia.

8. NVIDIA has identified the following individuals who are likely to be witnesses and may testify at trial about U.S. Patent No. 6,819,602:

- Ashfaq Shaikh, Senior Director of Engineering
- Alok Gupta, Senior Hardware Engineer

These likely witnesses work in Santa Clara, California. Proceedings in the Northern District of California would be far more convenient for these likely witnesses than proceedings in the Eastern District of Virginia.

9. NVIDIA has identified the following individual who is likely to be a witness and may testify at trial about U.S. Patent No. 6,262,938:

- Barry Wagner, Director of Technical Marketing

Mr. Wagner works in Santa Clara. Proceedings in the Northern District of California would be far more convenient for him than proceedings in the Eastern District of Virginia.

10. NVIDIA has identified the following individual who is likely be a witness and may testify at trial about U.S. Patent No. 6,287,902 and U.S. Patent No. 8,252,675:

- John Hu, Director of Advanced Technology

Mr. Hu works in Santa Clara. Proceedings in the Northern District of California would be far more convenient for him than proceedings in the Eastern District of Virginia.

11. NVIDIA has identified the following individuals who are likely to be witnesses and may testify at trial about U.S. Patent No. 6,804,724:

- Tyvis Cheung, Senior Manager of Display ASIC and Architecture
- Frans Sijstermans, Senior Director of Multimedia ASIC and Architecture
- Yuan Cao, Director, GPU Software
- Subhash Gutti, Senior System Software Engineer
- David Stears, Senior ASIC Engineer

All of these individuals work in Santa Clara. Proceedings in the Northern District of California would be far more convenient for these likely witnesses than proceedings in the Eastern District of Virginia.

12. NVIDIA has identified two employees, Jeff Fisher, Senior Vice President of the Gaming Business Unit, and Jay Puri, Executive Vice President of the Worldwide Field Operations, who are likely to be witnesses and may testify at trial about Sales and Marketing of NVIDIA's GPUs. Both of these individuals work in Santa Clara, California. Proceedings in the Northern District of California would be far more convenient for these likely witnesses than proceedings in the Eastern District of Virginia.

13. NVIDIA has also identified Deepu Talla, Vice President and General Manager of the Tegra Group, who is a likely witness and may testify at trial about sales and marketing for the Tegra business unit. Mr. Talla works in Santa Clara, California. Proceedings in the Northern District of California would be far more convenient for him than proceedings in the Eastern District of Virginia.

14. It would be far more convenient and less expensive for all of the witnesses named above to travel from NVIDIA's Santa Clara headquarters to the San Jose Courthouse than to the Richmond Courthouse. No anticipated witnesses are in Virginia.

15. Employees of Taiwan Semiconductor Manufacturing Company, Limited ("TSMC") are likely to be third party witnesses in this litigation.

16. To my knowledge after a reasonable investigation, TSMC has its headquarters and main operations located in the Hsinchu Science and Industrial Park in Hsinchu, Taiwan.

17. To my knowledge after a reasonable investigation, TSMC has a corporate office located at 2585 Junction Avenue, San Jose, CA 95134.

18. To my knowledge after a reasonable investigation, it would likely be more convenient for TSMC's personnel to be involved in litigation in the Northern District of

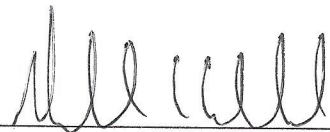
California, where TSMC's corporate office in San Jose is located, than in the Eastern District of Virginia.

19. Employees of third party ARM, Inc. are also likely to be witnesses in this litigation.

20. To my knowledge after a reasonable investigation, ARM's main regional office is located at 150 Rose Orchard Way San Jose, California 95134.

21. To my knowledge after a reasonable investigation, most of ARM's technical employees are located in Austin, Texas. It would likely be more convenient for ARM'S personnel to be involved in litigation in the Northern District of California, where ARMs' Main Regional Office is located, than in the Eastern District of Virginia.

I declare under the penalty of perjury that the forgoing is true and correct. Executed this 12th day of January, 2015 in Portland, Oregon.


Richard Calderwood