

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

I, Stephanie Luck, declare:

1. I am a full-time employee of NVIDIA Corporation ("NVIDIA"), where I hold the position of Director, Human Resources ("HR"). 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 work at NVIDIA's headquarters located at 2701 San Tomas Expressway, Santa Clara, California 95050. NVIDIA has been continuously operating in the Santa Clara area since 1993.
3. I reside in Santa Cruz, California.
4. I joined NVIDIA as an employee in 1998. I have held a number of positions in

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.

6. The vast majority of NVIDIA’s employees are involved with some aspect of engineering, sale, or marketing of NVIDIA’s GPUs, SOCs, and graphic cards.

7. As of November 2014, NVIDIA had approximately 9,103 U.S. employees. Of those, over 4,580 work at NVIDIA’s Santa Clara headquarters. Only 12 employees work in Virginia.

8. NVIDIA has several groups that are involved with the engineering of its graphics processing and related technology. 2,300 of those employees work at NVIDIA’s Santa Clara headquarters in the Northern District of California.

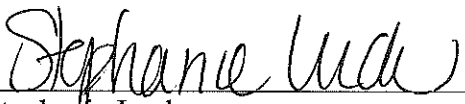
9. NVIDIA has Operations groups that primarily work with and manage the outside vendors who manufacture NVIDIA GPUs and SOCs. These groups also test the chips that are produced, and coordinate shipping of chips to customers. As of November 2014, NVIDIA had approximately 891 employees in these groups; 49% of those employees work at NVIDIA’s Santa Clara headquarters in the Northern District of California.

10. NVIDIA has groups of employees who are tasked with marketing its GPUs and SOCs to electronics manufacturers and end consumers. As of November 2014, NVIDIA had

Northern District of California.

12. As of November 2014, NVIDIA's U.S. legal department comprised approximately 37 employees; 92% of those employees work at NVIDIA's Santa Clara headquarters in the Northern District of 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.


Stephanie Luck