

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

SAMSUNG ELECTRONICS CO. LTD., et. al.,)	
)	
Plaintiff,)	
)	CIVIL ACTION NO. 3:14cv757-REP
v.)	
)	JURY TRIAL DEMANDED
NVIDIA CORPORATION, et. al.)	
)	
Defendant.)	

**DEFENDANT VELOCITY HOLDINGS, LLC’S ANSWER TO AMENDED
COMPLAINT**

Defendant Velocity Holdings, LLC (“Defendant”), by and through its undersigned attorneys, hereby file this Answer to Plaintiffs Samsung Electronics Company, Ltd. (“SEC”) and Samsung Electronics America, Inc.’s (“SEA”) (collectively “Plaintiffs” or “Samsung”) First Amended Complaint. Defendant states as follows:

THE PARTIES

1. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.
2. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.
3. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.
4. Defendant denies the allegations in this paragraph.
5. Defendant admits the allegations in this paragraph.

SAMSUNG

6. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.

7. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.

8. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.

9. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.

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14. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.

15. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.

16. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.

NVIDIA

17. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.

18. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.

19. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.

20. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.

21. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.

VELOCITY

22. Defendant admits that Velocity Holdings, LLC produces custom high-performance computers designed for gaming, digital graphic design, home theater use, and common home and office use and that Velocity Holdings, LLC provides scientific workstations. Defendant denies the remaining allegations.

23. Defendant avers that the referenced documents speak for themselves, and otherwise denies the allegations of this paragraph, including all characterizations of the documents beyond the text of the document and distortions via selective excerpts.

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28. Defendant avers that the referenced documents speak for themselves, and otherwise denies the allegations of this paragraph, including all characterizations of the documents beyond the text of the document and distortions via selective excerpts.

29. Defendant admits that Velocity Holdings, LLC sells computers, some of which may incorporate NVIDIA GPUs, and denies all remaining allegations in this paragraph.

30. The allegations in this paragraph contain subjective assessments from Plaintiffs and the accuracy of the allegations depends on context. Defendant therefore denies them as it lacks knowledge or information sufficient to form a belief about the truth of the allegations.

31. Defendant admits that Velocity Holdings, LLC sells products and services in the Commonwealth of Virginia. Defendant denies that they infringe any valid and enforceable claim of the Asserted Patents. Defendant avers that the referenced document speaks for itself, and otherwise denies the remaining allegations of this paragraph, including all characterizations of the documents beyond the text of the document and distortions via selective excerpt

JURISDICTION AND VENUE

32. Defendant admits that this action purports to arise under the patent laws of the United States, Title 35 of the United States Code, but denies that this action has any merit or that Plaintiffs are entitled to the relief sought. Defendant also admits that this Court has subject matter jurisdiction, but denies the remaining allegations of this paragraph.

33. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.

34. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.

35. Defendant admits that Velocity Holdings, LLC conducts business activities within the Commonwealth of Virginia, but denies that they infringe any valid and enforceable claim of the Asserted Patents. To the extent this paragraph also contains conclusions of law and not averments of facts to which an answer is required, but insofar as an answer may be deemed required, Defendant denies them.

36. Defendant admits that Velocity Holdings, LLC sells products nationwide, including in Virginia, but denies that they infringe any valid and enforceable claim of the Asserted Patents, and denies all other allegations in this paragraph.

37. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in this paragraph, and on that basis denies them.

38. Defendant avers that the referenced documents speak for themselves, and otherwise denies the allegations of this paragraph, including all characterizations of the documents beyond the text of the document and distortions via selective excerpts.

39. Defendant admits that Velocity Holdings, LLC was registered as a corporation with the Commonwealth of Virginia and appointed as its registered agent Gary S Cook, 4551

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