

**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

**SECOND DECLARATION OF RANDALL COPELAND IN SUPPORT OF
DEFENDANTS' MOTION TO TRANSFER VENUE PURSUANT
TO 28 U.S.C. § 1404(a), SEVER, AND STAY**

I, Randall Copeland, declare:

1. At no time has either Velocity Holdings or Velocity Micro ever sold any accused computer with a hybrid drive.
2. There are products from other manufacturers that are comparable to the NVIDIA products that Velocity uses in its computers that Velocity could use instead of the NVIDIA products in Velocity's computers.
3. Upon information and belief, the accused SX chassis is manufactured in China and the accused GX-2 chassis is manufactured in Taiwan.
4. Neither Velocity Holdings nor Velocity Micro has ever sold the ASUS G750JX, with an NVIDIA GeForce GTX 770M video card.

I declare under the penalty of perjury that the forgoing is true and correct. Executed this
2nd day of February, 2015 in Midlothian, Virginia.



Randall Copeland