

**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 SECOND AMENDED
ANSWER TO AMENDED COMPLAINT**

Defendant Velocity Holdings, LLC (“Defendant”), by and through its undersigned attorneys, hereby file this Second Amended 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.

10. 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.

11. 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.

12. 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.

13. 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.

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 admits that the referenced documents About Velocity and Velocity Gaming and Enthusiast Laptops are copies of webpages from the website <http://www.velocitymicro.com> and state that it is “the premier high-performance innovator of consumer technology and electronics in North America,” that it is “100% based in the USA in Richmond, VA,” and that some computers are “[a]ssembled by our expert engineers in Richmond, VA.” Defendant admits that the referenced document Configure Your M17 includes the text “Careful custom integration and testing, final assembly by hand in Richmond, Virginia, USA” under the section “Support.” Defendant otherwise denies the allegations of this

paragraph, including all characterizations of the documents beyond the text of the document and distortions via selective excerpts.

24. Defendant admits that the referenced documents are copies of webpages from the website <http://www.velocitymicro.com> and state “the immediate availability of the NVIDIA GeForce GTX 750, GTX 750 Ti, and the amazing GTX TITAN Black in select Gaming/Enthusiast and Workstation desktops” and “‘Every evolution of the GeForce cards presents better and better choices for consumers, and these new products are no exception,’ said Randy Copeland, President and CEO of Velocity. ‘With the best-in-class performance of the TITAN Black and incredible price for performance of the GTX 750 and 750 Ti, NVIDIA has brought two great choices to market. We’re excited to offer them to our enthusiast customers.’” Defendant otherwise denies the allegations of this paragraph, including all characterizations of the documents beyond the text of the document and distortions via selective excerpts.

25. Defendant admits that the referenced documents are copies of webpages from the website <http://www.velocitymicro.com> and state “desktops powered by NVIDIA GeForce GTX 780” and “‘Since our first Editors’ Choice award in 2002, we’ve seen PC hardware come a long way. NVIDIA has always led the way in that innovation,’ said Randy Copeland, President and CEO of Velocity. ‘After spending a few days testing the GeForce GTX 780, all I can say is WOW – they’ve done it again. This is seriously fast hardware and a must have for enthusiasts.’” Defendant otherwise denies the allegations of this paragraph, including all characterizations of the documents beyond the text of the document and distortions via selective excerpts.

26. Defendant admits that the referenced documents are copies of webpages from the website <http://www.velocitymicro.com> and state “Raptor X17 Notebook Featuring NVIDIA® GeForce® GTX 480M Mobile Graphics” and “‘With the release of the NVIDIA GeForce GTX

480M, we're able to provide a new level of mobile gaming performance to our customers who demand the best hardware,' said Chip Lowell, VP of Sales for Velocity. 'This is more than just a desktop replacement. It's the ultimate mobile gaming system.'" Defendant otherwise denies the allegations of this paragraph, including all characterizations of the documents beyond the text of the document and distortions via selective excerpts.

27. Defendant admits that it issues press releases and that it has sold computers including NVIDIA graphics cards. The referenced document is a press release titled "Velocity Micro Announces the Immediate Availability of NVIDIA GeForce GTX 750, 750 Ti, and TITAN Black Graphics." Defendant otherwise denies the allegations of this paragraph, including all characterizations of the documents beyond the text of the document and distortions via selective excerpts.

28. Defendant admits that the referenced documents are copies of webpages from the website <http://www.velocitymicro.com> and state "Velocity Micro Partners With NVIDIA To Launch GeForce 6 Series of Graphics" and "'We're pleased to be able to launch such compelling technology in conjunction with a well-respected company like NVIDIA,' said Velocity founder and president Randall Copeland. 'This partnership is just one of the many reasons why Velocity Micro is able to offer premium products to meet the needs of all its customers.'" Defendant 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 lacks knowledge or

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.