

EXHIBIT I

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Plaintiffs,

v.

NVIDIA CORPORATION, VELOCITY
MICRO, INC. D/B/A VELOCITY MICRO,
AND VELOCITY HOLDINGS, LLC

Defendants.

CIVIL ACTION NO. 3:14-CV-00757-REP

JURY TRIAL DEMANDED

FIRST-SECOND AMENDED COMPLAINT

Plaintiffs Samsung Electronics Company, Ltd. (“SEC”) and Samsung Electronics America, Inc. (“SEA”) (collectively “Samsung”), by and through their undersigned attorneys, hereby file this ~~First~~-Second Amended Complaint¹ against NVIDIA Corporation (“NVIDIA”), ~~Velocity~~-Old Micro, Inc. ~~d/b/a~~F/K/A Velocity Micro, Inc. and Velocity Holdings, LLC (collectively “Velocity”). All defendants will be referred to collectively as “Defendants.”

Samsung states as follows:

THE PARTIES

1. Plaintiff SEC is a multi-national corporation organized under the laws of Korea with its principal place of business located at 416 Maetan-3dong, Yeongtong-gu, Suwon-City, Gyeonggi-do, Korea 443-742.

¹[The Second Amended Complaint amends the First Amended Complaint by changing the name of the defendant originally identified as “Velocity Micro, Inc. D/B/A Velocity Micro” to “Old Micro, Inc. F/K/A Velocity Micro, Inc.” The only portions of the Second Amended Complaint that differ from the First Amended Complaint are the introductory paragraph, paragraph 4, paragraph 5, and footnote 2. Exhibit I, attached hereto, shows Samsung’s changes to those portions of the Second Amended Complaint. The remainder of the Second Amended Complaint is unchanged from the First Amended Complaint.](#)

2. Plaintiff SEA is a corporation organized and existing under the laws of the state of New York with its principal place of business in Ridgefield Park, New Jersey and is a wholly-owned subsidiary of SEC.

3. Defendant NVIDIA is a Delaware corporation with its headquarters located at 2701 San Tomas Expressway, Santa Clara, California 95050. NVIDIA imports into the United States, offers for sale, sells and/or uses in the United States graphics processing units (GPUs), system on a chip (SOC) units, graphics cards, and mobile computing devices such as tablet computers.

~~4. Defendant Velocity Micro, Inc., which does business in Virginia as Velocity Micro, is a corporation organized and existing under the laws of Delaware with its principal place of business located at 7510 Whitepine Road, Richmond, Virginia 23237. The State Corporation Commission of the Commonwealth of Virginia lists Velocity Micro, Inc.'s principal office as 9030 Stony Point Parkway, Suite 400, Richmond, Virginia, 23235. Velocity Micro, Inc. incorporates NVIDIA GPUs, SOCs, and/or graphics cards in products that it offers for sale, sells and/or uses in the United States.~~

4. Defendant Old Micro, Inc., which was formerly known as Velocity Micro, Inc., is a corporation organized and existing under the laws of Virginia. The State Corporation Commission of the Commonwealth of Virginia lists the location of Old Micro, Inc.'s registered agent as 9030 Stony Point Parkway, Suite 400, Richmond, Virginia, 23235. At times relevant to this action, Old Micro, Inc. manufactured computers that it offered for sale, sold and/or used in the United States.

5. Defendant Velocity Holdings, LLC is a limited liability corporation organized and existing under the laws of Virginia, which does business as Velocity Micro. Velocity Holdings,

LLC has ~~with its~~ its principal place of business located at 825835 Grove Rd. ~~Suite 3~~, Midlothian, Virginia 23114. The members of Velocity Holdings, LLC reside in the Eastern District of Virginia. Velocity Holdings, LLC is a manufacturer of computers that it offers for sale, sells and/or uses in the United States.

SAMSUNG

6. From its inception as a small business in Taegu, Korea, Samsung has grown to become one of the world's leading electronics companies, specializing in digital products, semiconductors, memory, and system integration. Today, Samsung's innovative consumer products are widely recognized and appreciated across the globe. Samsung designs, develops, manufacturers, and sells leading consumer electronics, including mobile phones, smartphones, tablet computers, and laptop computers.

7. Samsung has a long history of groundbreaking innovation across a wide range of technologies. During the 1970s and 1980s, Samsung's core technology businesses diversified and expanded globally. For example, Samsung began production of personal computers in 1983 and selected telecommunications and semiconductors as core business lines in 1988. **About Samsung.**² During this period, Samsung additionally challenged itself to restructure old businesses and enter new ones with the aim of becoming one of the world's top five electronics companies.

8. Samsung's commitment to innovation is demonstrated in part by the billions of dollars in research and development expenditures incurred over the years. From 2005 through 2010 alone, Samsung invested more than \$35 billion in research and development. More than a

² Bolded terms or references are defined in the text of this ~~First~~ Second Amended Complaint or in the section entitled "References."