

**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.)	
)	
NVIDIA CORPORATION, et. al.)	
)	
Defendant.)	

**DEFENDANT NVIDIA CORPORATION’S
ANSWER AND COUNTERCLAIMS TO SECOND AMENDED COMPLAINT**

Defendant NVIDIA Corporation (“NVIDIA” or “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 within 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 within this paragraph, and on that basis denies them.
3. Defendant admits that it is a Delaware corporation with its principal place of business at 2701 San Tomas Expressway, Santa Clara, California 95050. Defendant further admits that it imports into the United States, offers for sale, sells and/or uses in the United States certain graphics processing units and/or systems-on-a-chip, and denies any remaining allegations in this paragraph.

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

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

SAMSUNG

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

NVIDIA

17. Defendant admits that it designs, develops, supplies, and sells graphics processing units and mobile system-on-chip products. The accuracy of the remaining allegations contained in this paragraph depends on context and the paragraph contains subjective assessments from Plaintiffs. Thus, Defendant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations contained in this paragraph and therefore denies them.

18. Defendant admits that it sells a device named the Shield Tablet. Defendant further admits that the Shield Tablet supports the Android operating system. Defendants are without knowledge or information sufficient to form a belief as to the truth of the remaining allegations set forth in this paragraph, and on that basis deny them.

19. Defendant admits that it sells products and services through the United States, including in Virginia, and denies any remaining allegations in this paragraph.

20. Defendant admits that it sells products nationwide, including in Virginia. Defendant further avers that the referenced document speaks for itself, and denies all other allegations in this paragraph.

21. Defendant admits that it is registered as a foreign corporation with the Commonwealth of Virginia and may be served with process through its registered agent, Corporation Service Company, 1111 East Main Street, Richmond, VA 23219.

VELOCITY

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

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

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

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

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

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

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

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

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

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

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 denies the allegations in this paragraph.

34. Defendant denies the allegations in this paragraph.

35. Defendant denies the legal argument improperly included in this paragraph, and denies all remaining factual allegations.

36. Defendant admits that it sells products nationwide, including in Virginia, and denies all other allegations in this paragraph.

37. Defendant admits that it is registered as a foreign corporation with the Commonwealth of Virginia and may be served with process through its registered agent, Corporation Service Company, 1111 East Main Street, Richmond, VA 23219.

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

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

40. Defendant denies the allegations in this paragraph.

ACCUSED PRODUCTS

41. Defendant admits that the Amended Complaint defines the term “Accused Products” to include “Accused GPUs” and “Accused SOCs” and all products that contain an “Accused GPU” or “Accused SOC” that have been made, sold, or offered for sale, or imported into the United States at any time since November 4, 2008. Defendant denies that Defendant infringes any valid and enforceable claim of the asserted patents. Defendant denies any remaining allegations.

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