

# Exhibit B

## Parties' Proposed Pre-Trial Schedule (All Claims)

Event	Dates for 8 Samsung Patents	Dates for 4 NVIDIA Patents	
		NVIDIA's Proposed Dates	Samsung's Proposed Dates
File Protective Order	April 20, 2015		
Deadline to Provide Initial Infringement Contentions	April 21, 2015	April 21, 2015 48 total claims, no limit per patent	June 4, 2015 32 total claims, limit 10 per patent
Rule 26(a)(1) Initial Disclosures	April 24, 2015	April 24, 2015	May 28, 2015
Deadline to produce documents sufficient to show the operation of the accused instrumentalities (to the extent such documents are in Defendants' possession, custody, or control)	May 13, 2015	May 28, 2015	June 24, 2015
Deadline to Provide Invalidity Contentions	May 8, 2015	May 22, 2015	July 1, 2015
Exchange List of Proposed Claim Terms for Construction	May 15, 2015	May 29, 2015	July 8, 2015
First Asserted Claim Selection	May 20, 2015 48 total claims, 10 claims per patent	April 21, 2015 48 total claims, no limit per patent	June 4, 2015 32 total claims, limit 10 per patent
Exchange Revised List of Proposed Claim Terms for Construction	May 22, 2015	June 5, 2015	July 15, 2015
Deadline for Parties to Discuss Settlement and Report to Court regarding Same	May 27, 2015		

Event	Dates for 8 Samsung Patents	Dates for 4 NVIDIA Patents	
		NVIDIA's Proposed Dates	Samsung's Proposed Dates
Exchange proposed constructions for claim terms on the revised lists of claim terms for construction and supporting evidence for those constructions	May 25, 2015	June 8, 2015	July 22, 2015
First Invalidation Reference Selection	May 27, 2015 60 total references, limit 12 per patent	June 10, 2015 60 total references, limit 12 per patent	July 29, 2015 40 total references, limit 12 per patent
Exchange and File Final Constructions	May 29, 2015	June 12, 2015	August 3, 2015
Tutorial	June 3, 2015 at 10:00 AM	On or about June 17, 2015	On or about August 5, 2015
Opening Claim Construction Brief	June 5, 2015	June 19, 2015	August 12, 2015
Responsive Claim Construction Brief	June 12, 2015	June 26, 2015	August 19, 2015
<i>Markman</i> Hearing	June 22, 2015 at 10:00 AM	On or about July 6, 2015	On or about August 26, 2015
Second Asserted Claim Selection and Amended Infringement Contentions  24 total claims, limit 5 per patent	7 days after the Court issues its Claim Construction Order	7 days after the Court issues its Claim Construction Order on Counterclaim Patents  24 total claims, limit 5 per patent	7 days after the Court issues its Claim Construction Order on Counterclaim Patents  16 total claims, limit 5 per patent

Event	Dates for 8 Samsung Patents	Dates for 4 NVIDIA Patents	
		NVIDIA's Proposed Dates	Samsung's Proposed Dates
Second Invalidation Reference Selection  30 total references, limit 6 per patent	7 days after Samsung's Second Election of Asserted Claims	7 days after NVIDIA's Second Election of Asserted Claims  30 total references, limit 6 per patent	7 days after NVIDIA's Second Election of Asserted Claims  20 total references, limit 6 per patent
Exchange initial expert reports	September 18, 2015	September 18, 2015	November 20, 2015
Exchange rebuttal expert reports	October 9, 2015	October 9, 2015	December 11, 2015
Conclusion of all discovery, including expert discovery and expert depositions	October 30, 2015	October 30, 2015	January 29, 2016
Deadline for filing Summary Judgment Motions	November 5, 2015	November 5, 2015	February 4, 2016
Motions in Limine	November 10, 2015	November 10, 2015	February 9, 2016
Opposition to Motions in Limine	November 18, 2015	November 18, 2015	February 22, 2016
Written Stipulations of Uncontroverted Facts Meet and Confer	(24 days before pretrial)		
List of All Discovery Materials to be Offered at Trial to be Served (Includes Deposition Designations and Summaries of Same)	(21 days before pretrial)		
Replies in support of Motions in Limine	November 25, 2015	November 25, 2015	February 29, 2016

Event	Dates for 8 Samsung Patents	Dates for 4 NVIDIA Patents	
		NVIDIA's Proposed Dates	Samsung's Proposed Dates
Plaintiff's Witness Call List to be Filed	(18 days before pretrial)		
Plaintiff's Proposed Exhibit List Due	(18 days before pretrial)		
Plaintiff's Exhibits to be Delivered to Opposing Counsel	(18 days before pretrial)		
Defendants' Witness Call List to be Filed	(16 days before pretrial)		
Defendants' Proposed Exhibit List Due	(16 days before pretrial)		
Defendants' Exhibits to be Delivered to Opposing Counsel	(16 days before pretrial)		
Summary Judgment Hearing, if desired	(15 days before pretrial)		
Rebuttal Designations and Amended Summaries to be Served	(14 days before pretrial)		
Hearing on Motions in Limine (if desired)	December 2, 2015	December 2, 2015	March 2, 2016
Objections to Exhibits to be Filed with Clerk	(12 days before pretrial)		
Written stipulations of uncontroverted facts signed by Counsel and Filed with Clerk	(11 days before pretrial)		
Any Objection to Designations Due	(11 days before pretrial)		

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