Exhibit C

Parties' Proposed Pre-Trial and Trial Schedule for NVIDIA's Counterclaims against Samsung



	Dates for Counterclaims on Four NVIDIA Patents		
Event	NVIDIA's Proposed Dates	Samsung's Proposed Dates	
File Protective Order	April 20, 2015		
Deadline to Provide Initial Infringement Contentions	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	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 28, 2015	June 24, 2015	
Deadline to Provide Invalidity Contentions	May 22, 2015	July 1, 2015	
Exchange List of Proposed Claim Terms for Construction	May 29, 2015	July 8, 2015	
First Asserted Claim Selection	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	June 5, 2015	July 15, 2015	
Deadline for Parties to Discuss Settlement and Report to Court regarding Same	May 2	7, 2015	



	Dates for Counterclaims on Four NVIDIA Patents		
Event	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	June 8, 2015	July 22, 2015	
First Invalidity Reference Selection	June 10, 2015	July 29, 2015	
Selection	60 total references, limit 12 per patent	40 total references, limit 12 per patent	
Exchange and File Final Constructions	June 12, 2015	August 3, 2015	
Tutorial	On or about June 17, 2015	On or about August 5, 2015	
Opening Claim Construction Brief	June 19, 2015	August 12, 2015	
Responsive Claim Construction Brief	June 26, 2015	August 19, 2015	
Markman Hearing	On or about July 6, 2015	On or about August 26, 2015	
Second Asserted Claim Selection and Amended Infringement Contentions	7 days after the Court issues its Claim Construction Order on Counterclaim Patents	7 days after the Court issues its Claim Construction Order on Counterclaim Patents	
24 total claims, limit 5 per patent	24 total claims, limit 5 per patent	16 total claims, limit 5 per patent	
Second Invalidity Reference Selection	7 days after NVIDIA's Second Election of Asserted Claims	7 days after NVIDIA's Second Election of Asserted Claims	
30 total references, limit 6 per patent	30 total references, limit 6 per patent	20 total references, limit 6 per patent	



	Dates for Counterclaims on Four NVIDIA Patents		
Event	NVIDIA's Proposed Dates	Samsung's Proposed Dates	
Exchange initial expert reports	September 18, 2015	November 20, 2015	
Exchange rebuttal expert reports	October 9, 2015	December 11, 2015	
Conclusion of all discovery, including expert discovery and expert depositions	October 30, 2015	January 29, 2016	
Deadline for filing Summary Judgment Motions	November 5, 2015	February 4, 2016	
Motions in Limine	November 10, 2015	February 9, 2016	
Opposition to Motions in Limine	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	February 29, 2016	
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)		



	on Four NVIDIA Patents	
Event	NVIDIA's Proposed Dates	Samsung's Proposed Dates
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	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)	
Proposed Jury Instructions and Proposed Verdict Form Due to Clerk	(10 days before pretrial)	
Confer to Resolve Objections to Discovery Designations	(9 days before pretrial)	
Objections to Proposed Jury Instructions Due	(7 days before pretrial)	



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