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Attorneys for Defendants and Counterclaimants
Samsung Electronics Co., Ltd., et al.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

15 ADVANCED MICRO DEVICES, INC., et
16 al.,
17
18 Plaintiffs,
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20 v.
21 SAMSUNG ELECTRONICS CO., LTD.,
et al.,
22
23 Defendants.

Case No. CV-08-0986-SI
**STIPULATION REGARDING
INFRINGEMENT PROOF FOR U.S.
PATENT NO. 6,784,879**
[Civil L.R. 7-12]

22 Advanced Micro Devices, Inc. and ATI Technologies, ULC (collectively “AMD”), and
23 Samsung Electronics Co., Ltd.; Samsung Semiconductor, Inc.; Samsung Austin Semiconductor,
24 LLC; Samsung Electronics America, Inc.; Samsung Telecommunications America, LLC;
25 Samsung Techwin Co., Ltd.; and Samsung Opto-Electronics America, Inc. (collectively
26 “Samsung”) jointly submit this Stipulation regarding the existence of certain claim elements from
27 U.S. Patent No. 6,784,879, asserted by AMD, in consumer products sold by Samsung. The terms
28

1 “Television,” “Cell Phone,” “Camcorder,” and “Digital Camera” refer to those products that
2 Samsung has imported, sold, or offered for sale in the United States on or after February 19,
3 2008.

4 This Stipulation shall apply only to this case, captioned *Advanced Micro Devices, Inc., et*
5 *al. v. Samsung Electronics Co., Ltd., et al.*, Case No. CV-08-0986-SI.

6 Pursuant to Civil Local Rule 7-12, IT IS HEREBY STIPULATED AND AGREED, by
7 and between AMD and Samsung that:

8 1. Each Television, Cell Phone, Camcorder, and Digital Camera contains “a processing unit”
9 as recited in claims 11-24 of U.S. Patent No. 6,784,879.

10 2. Each Television, Cell Phone, Camcorder, and Digital Camera contains “memory that
11 stores programming instructions” as recited in claims 11-16 of U.S. Patent No. 6,784,879.

12 3. Each Television, Cell Phone, Camcorder, and Digital Camera contains “first,” “second,”
13 and “third” “storage means for storing programming instructions” as recited in claims 17-24 of
14 U.S. Patent No. 6,784,879.

15 4. The “processing unit” in each Television, Cell Phone, Camcorder, and Digital Camera
16 provides graphical user interface operations by reading “programming instructions” stored in a
17 “memory” or “storage means,” as recited in claims 11-24 of U.S. Patent No. 6,784,879.

18 5. Each Television, Cell Phone, Camcorder, and Digital Camera contains “programming
19 instructions” that cause the “processing unit” to provide “live video that is being presented as a
20 background on a display” as recited in claims 11-24 of U.S. Patent No. 6,784,879.

21 6. If the “programming instructions” in each Television, Cell Phone, Camcorder, and Digital
22 Camera cause the “processing unit” to simultaneously provide a “video control icon” and “live
23 video that is being presented on a display,” then the “video control icon relates to” that “live
24 video” as recited in claims 11-24 of U.S. Patent No. 6,784,879.

25 7. Each Television, Cell Phone, Camcorder, and Digital Camera that contains “programming
26 instructions” that cause the “processing unit” to display a “video control icon” also contains
27 “programming instructions” that cause the “processing unit” to “detect selection of the video
28 control icon” as recited in claims 11-24 of U.S. Patent No. 6,784,879.

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8. If the “programming instructions” in each Television, Cell Phone, Camcorder, and Digital Camera cause the “processing unit” to simultaneously provide a “control panel” and “live video that is being presented as a background on a display,” then the “processing unit” provides the “control panel” “while the live video remains in the background,” as recited in claims 11-24 of U.S. Patent No. 6,784,879.

9. Each Television, Cell Phone, Camcorder, and Digital Camera that contains “programming instructions” that cause the “processing unit” to display a “control panel” also contains “programming instructions” that cause the “processing unit” to “remove the control panel when another displayed element has been selected” as recited in claims 13, 16, 20, and 24 of U.S. Patent No. 6,784,879.

10. Each Television, Cell Phone, Camcorder, and Digital Camera that contains “programming instructions” that cause the “processing unit” to display a “control panel” also contains “programming instructions” that cause the “processing unit” to “adjust at least one attribute of the live video based on an input received via the control panel” as recited in claims 14-16 and 21-24 of U.S. Patent No. 6,784,879.

11. If the user manual for a Television, Cell Phone, Camcorder, or Digital Camera does not contain screen shots of the user interface for controlling video, that product infringes claims 11-24 of U.S. Patent No. 6,784,879.

DATED: February 25, 2009

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DATED: February 25, 2009

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TELECOMMUNICATIONS AMERICA, LLC;
SAMSUNG TECHWIN CO., LTD.; AND
SAMSUNG OPTO-ELECTRONICS AMERICA,
INC.**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

February __, 2009

Honorable Susan Illston
United States District Judge