

# Exhibit 6

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6 Attorneys for Plaintiffs:  
7 Advanced Micro Devices, Inc., and  
ATI Technologies, ULC  
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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

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13 ADVANCED MICRO DEVICES,  
INC., et al.,  
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15 Plaintiffs,  
16 v.  
17 SAMSUNG ELECTRONICS CO.,  
LTD., et al.,  
18 Defendants.

**AMD’S SUPPLEMENTAL RESPONSES  
AND OBJECTIONS TO SAMSUNG’S  
FIRST SET OF INTERROGATORIES TO  
AMD (NOS. 1, 9)**

Case No. CV-08-0986-SI

**HIGHLY CONFIDENTIAL – OUTSIDE  
COUNSEL’S EYES ONLY**

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22 Pursuant to Fed. R. Civ. P. 26 and 33, Defendant Advanced Micro Devices, Inc.  
23 and ATI Technologies, ULC (hereinafter “AMD”) hereby supplements its objections and  
24 responses to Samsung Electronics Co., Ltd., Samsung Semiconductor, Inc., Samsung  
25 Austin Semiconductor, LLC, Samsung Electronics America, Inc., Samsung  
26 Telecommunications America, LLC, Samsung Techwin Co., and Samsung Opto-  
27 Electronics America, Inc.’s (hereinafter “Samsung”) First Set of Interrogatories (Nos. 1,  
28 9) (hereinafter “Interrogatories”) as follows:

**HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL’S EYES ONLY**

1 respond to this interrogatory within a reasonable time after Samsung fulfills its discovery  
2 obligations.

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4 **Interrogatory No. 9:**

5 Please state what Plaintiffs contend was the level of ordinary skill in the art at the  
6 time of the alleged inventions claimed in the AMD Patents, identifying all facts relevant  
7 to this contention.

8 **Response to Interrogatory No. 9:**

9 AMD incorporates by reference its General Objections. AMD also objects to  
10 Samsung’s Interrogatory No. 9 as premature under Patent Local Rule 2-5 because  
11 Samsung has not yet served AMD with Samsung’s preliminary invalidity contentions and,  
12 as a result, has not identified those claims in the AMD patents that Samsung contends are  
13 obvious over the prior art. *See Townshend Intellectual Property, LLC v. Broadcom Corp.*,  
14 Slip Op. No. C-06-05118 (N.D. Cal. August 29, 2007) (holding that an interrogatory  
15 seeking non-infringement contentions prior to service of infringement contentions was  
16 premature under the Local Patent Rules). AMD objects to this Interrogatory to the extent  
17 that it seeks documents or information protected from discovery by the attorney-client  
18 privilege and attorney work product doctrine. AMD objects to this Interrogatory as  
19 premature to the extent it calls for expert testimony or opinion. AMD objects to this  
20 Interrogatory as overbroad because it calls for information regarding “the alleged  
21 inventions of the AMD Patents” without regard to the specific claims that have been or  
22 will be challenged as invalid in this matter, and without regard to the invalidity bases  
23 alleged.

24 Subject to and without waiving these objections, AMD states as follows:

25 AMD will provide an answer to this Interrogatory as to the claims Samsung asserts  
26 are obvious over the prior art within a reasonable time following AMD’s receipt of  
27 Samsung’s Preliminary Invalidity Contentions.

**Supplemental Response to Interrogatory No. 9:**

AMD incorporates by reference its General Objections. AMD also Objects to Interrogatory No. 9 to the extent that it seeks documents or information protected from discovery by the attorney-client privilege and attorney work product doctrine. AMD objects to this Interrogatory as premature to the extent it calls for expert testimony or opinion. AMD objects to this Interrogatory as overbroad because it calls for information regarding “the alleged inventions of the AMD Patents” without regard to the specific claims that have been or will be asserted in this matter, or that will be challenged as invalid.

Subject to and without waiving these objections, AMD states that the level of ordinary skill in the art at the time of the inventions claimed in the AMD Patents is as follows:

**I. Cheng ’990 Patent**

One having ordinary skill in the art would have a bachelor’s degree in electrical or computer engineering or computer science and at least two years of experience working in integrated circuit development, or an equivalent combination of education and experience.

**II. Sakamoto ’893 Patent**

One having ordinary skill in the art would be a person working in the relevant field and attempting to solve similar problems that the patent addressed, namely the design or fabrication of MOSFETs. Such a person would typically be a semiconductor device or process engineer with at least a bachelor’s degree in either electrical engineering, physics, chemistry, or materials science, plus at least 2 years of graduate study in one of those fields, or at least 2 years of experience in the semiconductor device/fabrication industries.

**HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL’S EYES ONLY**

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**II. Patel ’830 Patent**

One having ordinary skill in the relevant art would be a person having a master’s degree or higher in electrical engineering, plus 3 to 5 years of experience working in integrated circuit design, and particularly circuit design and physical layout.

**III. Iacoponi ’592 Patent**

One having ordinary skill in the art would have a master’s degree or higher in a related field, typically materials science, electrical engineering, chemical engineering, or mechanical engineering, and further would have at least 2 years of experience in either a semiconductor fabrication facility, or in semiconductor equipment manufacturing.

**IV. Purcell ’434 Patent**

One having ordinary skill in the art would have a bachelor’s degree in electrical or computer engineering or computer science and a basic working knowledge of computer architecture, or an equivalent combination of education and experience.

**V. Pedneau ’200 Patent**

One having ordinary skill in the art would have a bachelor’s degree in electrical or computer engineering or computer science, and at least two years of experience working in integrated circuit development, or an equivalent combination of education and experience.


**VI. Orr ’879 Patent**

One having ordinary skill in the art would have a bachelor’s degree in electrical or computer engineering or computer science or an equivalent combination of education and experience.

1 AS TO THE OBJECTIONS:

2  
3 DATED: March 6, 2009

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

4 By:   
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11 **ATTORNEYS FOR PLAINTIFFS**  
12 **ADVANCED MICRO DEVICES, INC. AND**  
13 **ATI TECHNOLOGIES, ULC**

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ROBINS, KAPLAN, MILLER & CIRESI L.L.P.  
ATTORNEYS AT LAW  
MINNEAPOLIS

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**VERIFICATION**

Kent Cooper, formerly Patents & Licensing Director of Advanced Micro Devices, Inc., now with the law firm of Floyd & Buss, LLP and continuing as agent for Advanced Micro Devices, Inc. and ATI Technologies Inc., ULC, states that he has read these answers, but does not assert that he has personal knowledge of the matters that are the subject of these responses to Interrogatories (Nos. 1, 9). On behalf of Advanced Micro Devices, Inc. and ATI Technologies Inc., ULC and in accordance with Rule 33 of the Federal Rules of Civil Procedures, these answers are true and correct to the best current knowledge of Kent Cooper.

Kent J. Cooper  
Signature

AGENT OF AMD  
Title  
3/6/09  
Date