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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

DOCUMENT SECURITY SYSTEMS,
INC.,

Plaintiff,

v.
SEOUL SEMICONDUCTOR CO.,
LTD. and SEOUL
SEMICONDUCTOR, INC.,

Defendants.

Case No. 2:17-CV-00981-JVS-JCG

**JOINT STIPULATION REGARDING
CONTINUING CLAIM
CONSTRUCTION DEADLINES**

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DOCUMENT SECURITY SYSTEMS,
INC.,
Plaintiff,
v.
CREE, INC.,
Defendant.

Case No. 2:17-CV-04263-JVS-JCG

DOCUMENT SECURITY SYSTEMS,
INC.,
Plaintiff,
v.
EVERLIGHT ELECTRONICS CO.,
LTD. and EVERLIGHT AMERICAS,
INC.,
Defendants.

Case No. 2:17-CV-04273-JVS-JCG

DOCUMENT SECURITY SYSTEMS,
INC.,
Plaintiff,
v.
LITE-ON, INC. and LITE-ON
TECHNOLOGY CORPORATION,
Defendants.

Case No. 2:17-CV-06050-JVS-JCG

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1 Plaintiff Document Security Systems, Inc. (“DSS”) and Defendants Seoul
 2 Semiconductor Co., Ltd. and Seoul Semiconductor, Inc. (“Seoul”), Cree, Inc.
 3 (“Cree”), Everlight Electronics Co., Ltd. and Everlight Americas, Inc. (“Everlight”),
 4 Lite-On, Inc. and Lite-On Technology Corporation (“Lite-On”), by and through their
 5 undersigned counsel of record, hereby submit the following Joint Stipulation and
 6 request to modify the Scheduling Order.

7 WHEREAS, Seoul filed petitions for *inter partes* review (IPR) in the Patent
 8 Office against all asserted claims of U.S. Patent Nos. 6,949,771 (the “’771 patent”)
 9 (IPR2018-00265); 7,256,486 (the “’486 patent”) (IPR2018-00333), and 7,524,087
 10 (the “’087 patent) (IPR2018-00522);

11 WHEREAS, the Patent Trial & Appeal Board (“PTAB”) is statutorily
 12 required to decide whether to institute IPR of these patents on or before June 13,
 13 2018 (’771 patent), June 28, 2018 (’486 patent), and July 30, 2018 (’087 patent),
 14 respectively;

15 WHEREAS, Defendants intend to renew their request to stay the litigation
 16 pending the outcome of the PTAB’s institution decisions;

17 WHEREAS, on March 26, 2018, the Court directed counsel to confer and
 18 submit a stipulation and proposed order regarding adjusting the Markman / Claim
 19 Construction hearing and related dates as necessary;

20 WHEREAS, the parties conferred and agreed to continue the claim
 21 construction dates as set forth as follows, which the parties believe will permit them
 22 and the Court sufficient time to resolve any renewed motions to stay before the
 23 Claim Construction Hearing:

EVENT	CURRENT DATES	NEW DATES
Exchange of Preliminary Constructions under Patent Rule 4-2	April 18, 2018	May 30, 2018

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