

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

RUSS AUGUST & KABAT  
Brian Ledahl (Bar No. 186579)  
*bledahl@raklaw.com*  
Neil A. Rubin (Bar No. 250761)  
*nrubin@raklaw.com*  
Jacob Buczko (Bar No. 269408)  
*jbuczko@raklaw.com*  
Paul A. Kroeger (Bar No. 229074)  
*pkroeger@raklaw.com*  
Minna Chan (Bar No. 305941)  
*mchan@raklaw.com*  
12424 Wilshire Boulevard 12th Floor  
Los Angeles, California 90025  
Telephone: 310-826-7474  
Facsimile: 310-826-6991  
  
*Attorneys for Plaintiff*  
DOCUMENT SECURITY SYSTEMS,  
INC.

LATHAM & WATKINS LLP  
Thomas W. Yeh (Bar No. 287118)  
*thomas.yeh@lw.com*  
355 South Grand Avenue, Suite 100  
Los Angeles, CA 90071-1560  
Telephone: (213) 485-1234  
Facsimile: (213) 891-8763

Charles H. Sanders (*pro hac vice*)  
*charles.sanders@lw.com*  
Anant K. Saraswat (*pro hac vice*)  
*anant.saraswat@lw.com*  
Christopher Henry  
*christopher.henry@lw.com*  
200 Clarendon Street  
Boston, Massachusetts 02116  
Telephone: (617) 948-6000  
Facsimile: (617) 948-6001

*Attorneys for Defendants*  
SEOUL SEMICONDUCTOR CO.,  
LTD. and SEOUL  
SEMICONDUCTOR, INC.

*Additional Counsel Listed on Third and Fourth Pages*

**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**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

JONES DAY  
Steven J. Corr (Bar No. 216243)  
*sjcorr@jonesday.com*  
555 South Flower Street  
Fiftieth Floor  
Los Angeles, CA 90071

Blaney Harper (*pro hac vice*)  
*bharper@jonesday.com*  
51 Louisiana Avenue, N.W.  
Washington, D.C. 20001.2113

*Attorneys for Defendant*  
CREE, INC.

LATHAM & WATKINS LLP  
Thomas W. Yeh (Bar No. 287118)  
*thomas.yeh@lw.com*  
355 South Grand Avenue, Suite 100  
Los Angeles, CA 90071-1560  
Telephone: (213) 485-1234  
Facsimile: (213) 891-8763

Charles H. Sanders (*pro hac vice*)  
*charles.sanders@lw.com*  
Anant K. Saraswat (*pro hac vice*)  
*anant.saraswat@lw.com*

Christopher Henry  
*christopher.henry@lw.com*  
200 Clarendon Street  
Boston, Massachusetts 02116  
Telephone: (617) 948-6000  
Facsimile: (617) 948-6001

*Attorneys for Defendants*  
SEOUL SEMICONDUCTOR CO.,  
LTD. and SEOUL  
SEMICONDUCTOR, INC.

1 VINSON & ELKINS LLP  
2 Christopher Kao (Bar No. 237716)  
3 *ckao@velaw.com*  
4 David J. Tsai (Bar No. 244479)  
5 *dtsai@velaw.com*  
6 Brock S. Weber (Bar No. 261383)  
7 *bweber@velaw.com*  
8 555 Mission Street, Suite 2000  
9 San Francisco, CA 94105  
10 Tel.: 415.979.6900  
11 Fax: 415.651.8786

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
*Attorneys for Defendant*  
LITE-ON, INC.

HANSON BRIDGETT LLP  
Raffi Zerounian (Bar No. 236388)  
*rzerounian@hansonbridgett.com*  
Garret M. Mott (Bar No. 285128)  
*gmott@hansonbridgett.com*  
555 S. Flower St., Ste. 650  
Los Angeles, CA 90071  
Tel: (213) 395-7620  
Fax: (213) 395-7615

Russell C. Petersen (Bar No. 264245)  
*russ.petersen@hansonbridgett.com*  
425 Market St., 26th Fl.  
San Francisco, CA 94105  
Tel: (415) 777-3200  
Fax: (415) 541-9366

Li Chen (*pro hac vice*)  
*lchen@chenmalin.com*  
CHEN MALIN LLP  
1700 Pacific Ave., Ste. 2400  
Dallas, TX 75201  
Tel: (214) 627-9950  
Fax: (214) 627-9940

*Attorneys for Defendants*  
EVERLIGHT ELECTRONICS CO.,  
LTD. and EVERLIGHT AMERICAS,  
INC.

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

28

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.