

1 LATHAM & WATKINS LLP  
Bradley A. Hyde (Bar No. 301145)  
2 *bradley.hyde@lw.com*  
650 Town Center Drive - 20<sup>th</sup> Floor  
3 Costa Mesa, California 92626-1925  
Telephone: (714) 540-1235  
4 Facsimile: (714) 755-8290

5 LATHAM & WATKINS LLP  
Charles H. Sanders (*pro hac vice*)  
6 *charles.sanders@lw.com*  
Anant K. Saraswat (*pro hac vice*)  
7 *anant.saraswat@lw.com*  
200 Clarendon Street  
8 Boston, Massachusetts 02116  
Telephone: (617) 948-6000  
9 Facsimile: (617) 948-6001

10 LATHAM & WATKINS LLP  
Lesley M. Hamming (*pro hac vice*)  
11 *lesley.hamming@lw.com*  
LATHAM & WATKINS LLP  
12 330 N. Wabash Avenue, Suite 2800  
Chicago, Illinois 60611  
13 Telephone: (312) 876-7700  
Facsimile: (312) 993-9767

14 Attorneys for Defendants SEOUL  
15 SEMICONDUCTOR CO., LTD and  
SEOUL SEMICONDUCTOR, INC.  
16

17 **UNITED STATES DISTRICT COURT**  
18 **CENTRAL DISTRICT OF CALIFORNIA**  
19 **SOUTHERN DIVISION**

20  
21 DOCUMENT SECURITY SYSTEMS,  
INC., a New York corporation,

22 Plaintiff,

23 v.

24 SEOUL SEMICONDUCTOR CO.,  
25 LTD, a Korean corporation, and  
26 SEOUL SEMICONDUCTOR, INC., a  
California corporation,

27 Defendants.  
28

Case No. 8:17-cv-00981-JVS-JCG

**DEFENDANTS' NOTICE OF MOTION AND  
MOTION TO DISMISS THE FIRST  
AMENDED COMPLAINT; AND  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT THEREOF**

Judge: Honorable James V. Selna

Date: October 16, 2017

Time: 1:30 pm

Courtroom: 10C

1 TO DOCUMENT SECURITY SYSTEMS, INC. AND ITS ATTORNEYS OF  
2 RECORD:

3 PLEASE TAKE NOTICE that on October 16, 2017, at 1:30 p.m., or as soon  
4 thereafter as counsel may be heard, in Courtroom 10C before the Honorable James  
5 V. Selna of the United States District Court for the Central District of California,  
6 located at 411 West Fourth Street, Santa Ana, California, defendants Seoul  
7 Semiconductor Co., Ltd. (“SSC”) and Seoul Semiconductor, Inc. (“SSI”)  
8 (collectively, “Seoul” or “Defendants”) will, and hereby do, move to dismiss  
9 Document Security System, Inc.’s (“DSS’s”) claims for induced infringement and  
10 willful infringement of all three asserted patents and to dismiss DSS’s claim for  
11 direct infringement of U.S. Patent No. 6,949,771 (the “771 patent”).

12 Seoul makes this motion under Federal Rule of Civil Procedure 12(b)(6) on  
13 the grounds that DSS’s First Amended Complaint fails to state a plausible claim  
14 for induced or willful infringement or direct infringement of the ’771 patent. *See*  
15 *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009). This motion is supported by the  
16 attached Memorandum of Points and Authorities; the files, records, and pleadings  
17 in this action; and any arguments presented at the time of the hearing on this  
18 motion.

19 *L.R. 7-3 Statement*

20 This motion is made following the conference of counsel under Local Rule  
21 7-3, which took place on August 22, 2017.

22  
23 Dated: August 29, 2017

LATHAM & WATKINS LLP

24  
25 By: /s/ Bradley A. Hyde  
26 Bradley A. Hyde (Bar No. 301145)  
27 Charles H. Sanders (*pro hac vice*)  
28 Anant K. Saraswat (*pro hac vice*)  
Lesley M. Hamming (*pro hac vice*)

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

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