

# Exhibit E

1 RUSS AUGUST & KABAT  
Brian Ledahl (CA SB No. 186579)  
2 Neil A. Rubin (CA SB No. 250761)  
Jacob Buczko (CA SB No. 269408)  
3 RUSS AUGUST & KABAT  
12424 Wilshire Boulevard 12th Floor  
4 Los Angeles, California 90025  
Telephone: 310-826-7474  
5 Facsimile: 310-826-6991  
E-mail: bledahl@raklaw.com  
6 E-mail: nrubin@raklaw.com  
E-mail: jbuczko@raklaw.com  
7

8 *Attorneys for Plaintiff Document Security Systems, Inc.*

9 **IN THE UNITED STATES DISTRICT COURT**  
10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
11 **SOUTHERN DIVISION**

12 DOCUMENT SECURITY SYSTEMS,  
13 INC.,

14 Plaintiff,

15 v.

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

17 Defendants.  
18

Civil Action No. 8:17-cv-00981

**JURY TRIAL DEMANDED**

19 **COMPLAINT FOR PATENT INFRINGEMENT**

20 This is an action for patent infringement arising under the Patent Laws of the  
21 United States of America, 35 U.S.C. § 1 *et seq.* in which Document Security Systems,  
22 Inc. (“DSS” or “Plaintiff”) makes the following allegations against Defendants Seoul  
23 Semiconductor Co., Ltd. (“Seoul Korea”) and Seoul Semiconductor, Inc. (“Seoul  
24 America”) (collectively “Seoul” or “Defendants”).  
25  
26  
27  
28

**PARTIES**

1  
2 1. Document Security Systems, Inc. is a publicly-traded New York  
3 corporation. Founded in 1984, DSS is a global leader in brand protection, digital  
4 security solutions and anti-counterfeiting technologies.

5 2. In November 2016, DSS acquired a portfolio of patents covering  
6 technologies used in Light-Emitting Diode (“LED”) lighting products, including the  
7 patents-in-suit. The patents in this portfolio were originally assigned to Agilent  
8 Technologies, Inc. and/or the successors of its LED business. Since its recent  
9 acquisition of these patents, DSS has worked to expand its business efforts regarding  
10 LED technology. DSS is pursuing both licensing and commercialization of this  
11 technology acquisition.

12 3. On information and belief, Seoul Semiconductor Co., Ltd. is a corporation  
13 organized and existing under the laws of the Republic of Korea with its principal place  
14 of business at 1B-25, 727, Wonsi- dong, Danwon-gu, Ansan-city, Gyeonggi-do,  
15 Korea 425-851. Upon information and belief, Seoul Korea manufactures light-  
16 emitting diode (“LED”) products in Korea and, through its subsidiary, Defendant  
17 Seoul America, has sales offices in the United States. Defendant Seoul Korea can be  
18 served with process in Korea pursuant to the Hague Convention on the Service  
19 Abroad of Judicial and Extrajudicial Documents, Article 1, November 15, 1965  
20 T.I.A.S. No. 6638, 20 U.S.T. 361 (U.S. Treaty 1969).

21 4. On information and belief, Seoul Semiconductor, Inc. is a California  
22 corporation with its principal place of business at 1895 Beaver Ridge Circle, Suite G,  
23 Norcross, Georgia 30071. Upon information and belief, Seoul America sells and/or  
24 offers for sale nationwide LED products manufactured by Seoul Korea, including in  
25 the State of California and in this judicial district. Defendant Seoul America can be  
26 served through its registered agent, Jiyeon Jun, 5856 Corporate Avenue, Suite 240,  
27 Cypress, California 90630.

28

1 **JURISDICTION AND VENUE**

2 5. This action arises under the patent laws of the United States, Title 35 of the  
3 United States Code. Accordingly, this Court has subject matter jurisdiction under 28  
4 U.S.C. §§ 1331 and 1338(a).

5 6. This Court has personal jurisdiction over Defendants in this action because,  
6 among other reasons, Defendants have committed acts within the Central District of  
7 California giving rise to this action and have established minimum contacts with the  
8 forum state of California. Defendants directly and/or through subsidiaries or  
9 intermediaries (including distributors, retailers, and others), have committed and  
10 continue to commit acts of infringement in this District by, among other things,  
11 making, using, importing, offering for sale, and/or selling products and/or services  
12 that infringe the patents-in-suit. Thus, Defendants have purposefully availed  
13 themselves of the benefits of doing business in the State of California and the exercise  
14 of jurisdiction over Defendants would not offend traditional notions of fair play and  
15 substantial justice.

16 7. Venue is proper in this District under 28 U.S.C. §§ 1391 (b)-(c) and 1400(b)  
17 because Defendants have a regular and established place of business in this District  
18 and have committed acts of patent infringement in this District. Defendants, for  
19 example, have a regular and established place of business at 5856 Corporate Ave, No.  
20 240, Cypress, CA 90630, which is located in Orange County.

21 **BACKGROUND**

22 8. DSS is the owner by assignment of United States Patent No. 6,949,771 (“the  
23 ’771 Patent”) entitled “Light Source.” The ’771 Patent was duly and legally issued by  
24 the United States Patent and Trademark Office on September 27, 2005. A true and  
25 correct copy of the ’771 Patent is included as Exhibit A.

26 9. DSS is the owner by assignment of United States Patent No. 7,524,087 (“the  
27 ’087 Patent”) entitled “Optical Device.” The ’087 Patent was duly and legally issued  
28 by the United States Patent and Trademark Office on April 28, 2009. A true and

1 correct copy of the '087 Patent is included as Exhibit B.

2 10. DSS is the owner by assignment of United States Patent No. 7,256,486  
3 (“the '486 Patent”) entitled “Packing Device for Semiconductor Die, Semiconductor  
4 Device Incorporating Same and Method of Making Same.” The '486 Patent was duly  
5 and legally issued by the United States Patent and Trademark Office on August 14,  
6 2007. A true and correct copy of the '486 Patent is included as Exhibit C

7 11. DSS owns all rights, title, and interest in and to the '771, '087 and '486  
8 Patents (collectively, “asserted patents” or “patents-in-suit”), including all rights to  
9 sue and recover for past and future infringement.

10 **COUNT I**

11 **INFRINGEMENT OF THE '771 PATENT**

12 12. DSS references and incorporates by reference paragraphs 1 through 10 of  
13 this Complaint.

14 13. Defendants make, use, offer for sale, sell, and/or import in the United  
15 States products and/or services that infringe various claims of the '771 Patent, and  
16 continues to do so. By way of illustrative example, Defendants’ infringing products  
17 include without limitation, all versions and variations, including predecessor and  
18 successor models, of its T6 Series, and LEDs including the 3020, 3030 (automotive)  
19 3528, and 5630 (automotive) packages. Defendants’ infringing products also include  
20 products, e.g., light bulbs, displays and fixtures that contain at least one infringing  
21 LED product. Defendants’ infringing products are collectively referred to hereinafter  
22 as “'771 Accused Instrumentalities.”

23 14. Defendants have directly infringed and continue to directly infringe the  
24 '771 Patent by, among other things, making, using, offering for sale, selling, and/or  
25 importing the '771 Accused Instrumentalities. Such products and/or services are  
26 covered by one or more claims of the '771 Patent’s including at least claims 1 to 8  
27 because they contain each element of those claims.

28

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