

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 **IN THE UNITED STATES DISTRICT COURT**  
**FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
18 **SOUTHERN DIVISION**

19 Document Security Systems, Inc.,  
20 *Plaintiff,*

21 v.

22 SEOUL SEMICONDUCTOR CO.,  
LTD, a Korean corporation, and  
23 SEOUL SEMICONDUCTOR, INC., a  
California corporation,

24 *Defendants.*

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

**SEOUL SEMICONDUCTOR CO.,  
LTD. AND SEOUL  
SEMICONDUCTOR, INC.’S  
ANSWER TO FIRST  
AMENDED COMPLAINT FOR  
PATENT INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

Assigned to: Honorable James V.  
Selna

1 Defendants Seoul Semiconductor Company Ltd. (“SSC”) and Seoul  
2 Semiconductor, Inc. (“SSI”) (collectively, “Seoul” or “Defendants”), by and  
3 through their undersigned attorneys, answer the First Amended Complaint For  
4 Patent Infringement (“the First Amended Complaint”) filed by Plaintiff Document  
5 Security Systems, Inc. (“DSS”) as follows:

6 **PARTIES**

7 1. Defendants are without knowledge or information sufficient to form a  
8 belief as to the truth or falsity of the allegations in Paragraph 1 of the First  
9 Amended Complaint, and therefore deny the same.

10 2. Defendants are without knowledge or information sufficient to form a  
11 belief as to the truth or falsity of the allegations in Paragraph 2 of the First  
12 Amended Complaint, and therefore deny the same.

13 3. Defendants admit that SSC is a corporation organized and existing  
14 under the laws of the Republic of Korea with its principal place of business in  
15 Danwon-gu, Ansan-si, Gyeonggi-do, Korea. Defendants admit that SSC  
16 manufactures light-emitting diode (“LED”) products in Korea and that its  
17 subsidiary SSI has sales offices in the United States. Paragraph 3 contains  
18 conclusions of law as to which no answer is required, including the statement  
19 “Defendant Seoul Korea can be served with process in Korea pursuant to the  
20 Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents,  
21 Article 1, November 15, 1965 T.I.A.S. No. 6638, 20 U.S.T. 361 (U.S. Treaty  
22 1969).” Defendants deny any remaining allegations and/or legal conclusions set  
23 forth in Paragraph 3.

24 4. Defendants admit that Seoul Semiconductor, Inc. is a California  
25 corporation with a place of business at 1895 Beaver Ridge Circle, Suite G,  
26 Norcross, Georgia 30071. Defendants admit that SSI sells and/or offers for sale  
27 LED products in the United States manufactured by Seoul Korea. Paragraph 4  
28 contains conclusions of law to which no answer is required, including the

1 statement “Defendant Seoul America can be served through its registered agent,  
2 Jiyoon Jun, 5856 Corporate Avenue, Suite 240, Cypress, California 90630.”  
3 Defendants deny any remaining allegations and/or legal conclusions set forth in  
4 Paragraph 4.

5 **JURISDICTION AND VENUE**

6 5. Admitted.

7 6. For the purposes of this present case only, Defendants will not contest  
8 that this Court has personal jurisdiction over Defendants. Defendants deny that  
9 they directly and/or through subsidiaries or intermediaries, have committed or  
10 continue to commit any acts of infringement in this District. Paragraph 6 contains  
11 conclusions of law to which no answer is required. Defendants deny the remaining  
12 allegations in Paragraph 6.

13 7. Paragraph 7 contains conclusions of law to which no answer is  
14 required. For the purposes of this present case only, Defendants will not contest  
15 that venue is proper in this judicial district. Defendants admit that Seoul  
16 Semiconductor, Inc. has a place of business at 1895 Beaver Ridge Circle, Suite G,  
17 Norcross, Georgia 30071. Defendants deny the remaining allegations in Paragraph  
18 7.

19 **BACKGROUND**

20 8. Defendants admit that the face page of U.S. Patent No. 6,949,771  
21 (“the ’771 Patent”) identifies an issue date of September 27, 2005. Defendants  
22 further admit that the face page of the ’771 Patent lists the title as “Light Source.”  
23 Defendants admit that Exhibit A to the First Amended Complaint purports to be a  
24 copy of the ’771 Patent. Defendants are without knowledge or information  
25 sufficient to form a belief regarding the remaining allegations of Paragraph 8 of the  
26 First Amended Complaint, and on that basis, deny these allegations.

27 9. Defendants admit that the face page of U.S. Patent No. 7,524,087  
28 (“the ’087 Patent”) identifies an issue date of April 28, 2009. Defendants further

1 admit that the face page of the '087 Patent lists the title as "Optical Device."  
2 Defendants admit that Exhibit B to the First Amended Complaint purports to be a  
3 copy of the '087 Patent. Defendants are without knowledge or information  
4 sufficient to form a belief regarding the remaining allegations of Paragraph 9 of the  
5 First Amended Complaint, and on that basis, deny these allegations.

6 10. Defendants admit that the face page of U.S. Patent No. 7,256,486  
7 ("the '486 Patent") identifies an issue date of August 14, 2007. Defendants further  
8 admit that the face page of the '486 Patent lists the title as "Packing Device for  
9 Semiconductor Die, Semiconductor Device Incorporating Same and Method of  
10 Making Same." Defendants admit that Exhibit C to the First Amended Complaint  
11 purports to be a copy of the '486 Patent. Defendants are without knowledge or  
12 information sufficient to form a belief regarding the remaining allegations of  
13 Paragraph 10 of the First Amended Complaint, and on that basis, deny these  
14 allegations.

15 11. Defendants are without knowledge or information sufficient to form a  
16 belief regarding the allegations of Paragraph 11 of the First Amended Complaint,  
17 and on that basis, deny these allegations.

18 **COUNT I**

19 **INFRINGEMENT OF THE '771 PATENT**

20 12. Defendants repeat their denials and admissions regarding Paragraphs  
21 1-11 above as if fully set forth herein.

22 13. Denied.

23 14. SSC admits that it sells and offers to sell 802 Series (Automotive)  
24 LED products. Defendants deny the remaining allegations in Paragraph 14.

25 15. Denied.

26 16. Defendants admit that the 802 Series (Automotive) includes an LED  
27 mounted in the package, and that there is a transparent encapsulation. Defendants  
28 deny the remaining allegations in Paragraph 16.

1 17. Defendants admit that the 802 Series (Automotive) has a metal lead  
2 frame. Defendants deny the remaining allegations in Paragraph 17.

3 18. Denied.

4 19. Denied.

5 20. Defendants admit that they have had actual knowledge of the '771  
6 Patent no later than service of the First Amended Complaint. Defendants deny the  
7 remaining allegations in Paragraph 20.

8 21. Denied.

9 22. Defendants admit that they have been aware of the '771 Patent as of a  
10 date no later than the date they were served with the complaint in the case 2:17-cv-  
11 308, filed April 13, 2017. The allegations of this paragraph otherwise have been  
12 dismissed, and no response is required. Regardless, Defendants deny the  
13 remaining allegations in Paragraph 22.

14 23. Denied.

15 **COUNT II**

16 **INFRINGEMENT OF THE '087 PATENT**

17 24. Defendants repeat their denials and admissions corresponding to  
18 Paragraphs 1-23 above as if fully set forth herein. Defendants deny the remaining  
19 allegations in Paragraph 24.

20 25. Denied.

21 26. SSC admits that it sells and offers to sell 825 Series LED products.  
22 Defendants admit that 825 Series products are optical devices and have a lead  
23 frame with multiple leads. Defendants deny the remaining allegations in  
24 Paragraph 26.

25 27. Denied.

26 28. Defendants admit that the 825 Series LEDs have at least one LED die  
27 and an encapsulant around the LED die. Defendants deny the remaining  
28 allegations in Paragraph 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.