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SEOUL SEMICONDUCTOR, INC.  
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17 **UNITED STATES DISTRICT COURT**  
18 **CENTRAL DISTRICT OF CALIFORNIA**  
19 **SOUTHERN DIVISION**

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

22 Plaintiff,

23 v.

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

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

**DECLARATION OF BRADLEY A. HYDE  
IN SUPPORT OF DEFENDANTS' MOTION  
TO DISMISS PLAINTIFF'S RESTATED  
WILLFUL INFRINGEMENT CLAIM**

Judge: Honorable James V. Selna  
Date: February 5, 2018  
Time: 1:30 pm  
Courtroom: 10C

1 I, Bradley A. Hyde, declare as follows:

2 1. I am an attorney at the law firm of Latham & Watkins LLP and am  
3 counsel of record for Seoul Semiconductor Co., Ltd. (“SSC”) and Seoul  
4 Semiconductor, Inc. (“SSI”) (collectively, “Seoul” or “Defendants”) in this matter.

5 2. I submit this declaration in support of Defendants’ Motion to Dismiss  
6 Plaintiff’s Restated Willfulness Claim.

7 3. This declaration is based on my personal knowledge of the facts stated  
8 below and, if called upon as a witness, I would testify competently to them based  
9 on such personal knowledge.

10 4. Attached hereto as Exhibit A is a true and correct copy of the Second  
11 Amended Complaint for Patent Infringement (Dkt. No. 40).

12 5. Attached hereto as Exhibit B is a true and correct copy of the First  
13 Amended Complaint (Dkt. No. 18).

14 6. Attached hereto as Exhibit C is a true and correct copy of the Order  
15 Regarding Motion to Dismiss (Dkt. No. 36-1).

16 7. Attached hereto as Exhibit D is a true and correct copy of Defendants’  
17 Notice of Motion and Motion to Dismiss the First Amended Complaint Second  
18 Amended Complaint (Dkt. No. 23).

19 8. Attached hereto as Exhibit E is a true and correct copy of Plaintiff’s  
20 Opposition to Defendants’ Motion to Dismiss the First Amended Complaint (Dkt.  
21 No. 29).

22 9. Attached hereto as Exhibit F is a true and correct copy of the  
23 Defendants’ Reply Memorandum of Law in Support of Their Motion to Dismiss  
24 the First Amended Complaint (Dkt. No. 30).

25 10. Attached hereto as Exhibit G is a true and correct copy of the Order  
26 Granting in Part and Denying in Part Defendants’ Motion to Dismiss First  
27 Amended Complaint (Dkt. No. 36).

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1 I declare under penalty of perjury under the laws of the United States that  
2 the foregoing is true and correct. Executed this 4<sup>th</sup> day of December, 2017.

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/s/Bradley A. Hyde  
Bradley A. Hyde