

Exhibit A

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

Attorneys for Plaintiff Document Security Systems, Inc.

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

DOCUMENT SECURITY SYSTEMS,
INC.,

Plaintiff,

v.

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

Defendants.

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

**SECOND AMENDED COMPLAINT
FOR PATENT INFRINGEMENT**

JURY TRIAL DEMANDED

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

6 PARTIES

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

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

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

26 4. On information and belief, Seoul Semiconductor, Inc. is a California
27 corporation with its principal place of business at 1895 Beaver Ridge Circle, Suite G,
28 Norcross, Georgia 30071. Upon information and belief, Seoul America sells and/or

1 offers for sale nationwide LED products manufactured by Seoul Korea, including in
2 the State of California and in this judicial district. Defendant Seoul America can be
3 served through its registered agent, Jiyoon Jun, 5856 Corporate Avenue, Suite 240,
4 Cypress, California 90630.

5 JURISDICTION AND VENUE

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

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

20 7. Venue is proper in this District under 28 U.S.C. §§ 1391 (b)-(c) and 1400(b)
21 because Defendants have a regular and established place of business in this District
22 and have committed acts of patent infringement in this District. Defendants, for
23 example, have a regular and established place of business at 5856 Corporate Ave, No.
24 240, Cypress, CA 90630, which is located in Orange County.

25 BACKGROUND

26 8. DSS is the owner by assignment of United States Patent No. 6,949,771 (“the
27 ’771 Patent”) entitled “Light Source.” The ’771 Patent was duly and legally issued by
28 the United States Patent and Trademark Office on September 27, 2005. A true and

1 correct copy of the '771 Patent is included as Exhibit A.

2 9. DSS is the owner by assignment of United States Patent No. 7,524,087 (“the
3 '087 Patent”) entitled “Optical Device.” The '087 Patent was duly and legally issued
4 by the United States Patent and Trademark Office on April 28, 2009. A true and
5 correct copy of the '087 Patent is included as Exhibit B.

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

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

14 COUNT I

15 INFRINGEMENT OF THE '771 PATENT

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

18 13. Defendants make, use, offer for sale, sell, and/or import in the United
19 States products and/or services that infringe various claims of the '771 Patent, and
20 continues to do so. By way of illustrative example, Defendants' infringing products
21 include without limitation, all versions and variations, including predecessor and
22 successor models, of its T6 Series LEDs, SFT-722NS, and LEDs including the 3020,
23 3030 (automotive), 3528, and 5630 (automotive) packages. Defendants' infringing
24 products also include products, e.g., light bulbs, displays and fixtures that contain at
25 least one infringing LED product. Defendants' infringing products are collectively
26 referred to hereinafter as “'771 Accused Instrumentalities.”

27 14. As an illustrative example, Defendants import, sell and offer to sell their
28 802 Series (Automotive) LED products. Defendants' 802 Series (Automotive)

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