

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 **IN THE UNITED STATES DISTRICT COURT**  
17 **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 SECOND  
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 Second Amended Complaint For  
4 Patent Infringement (“the Second Amended Complaint”) filed by Plaintiff  
5 Document 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 Second  
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 Second  
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 SSI is a California corporation with a place of  
25 business at 1895 Beaver Ridge Circle, Suite G, Norcross, Georgia 30071.  
26 Defendants admit that SSI sells and/or offers for sale LED products in the United  
27 States manufactured by Seoul Korea. Paragraph 4 contains conclusions of law to  
28 which no answer is required, including the statement “Defendant Seoul America

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

4 **JURISDICTION AND VENUE**

5 5. Admitted.

6 6. Paragraph 6 contains conclusions of law to which no answer is  
7 required. 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. Defendants deny the  
11 remaining allegations in Paragraph 6.

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

18 **BACKGROUND**

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

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

1 Defendants admit that Exhibit B to the Second Amended Complaint purports to be  
2 a copy of the '087 Patent. Defendants are without knowledge or information  
3 sufficient to form a belief regarding the remaining allegations of Paragraph 9 of the  
4 Second Amended Complaint, and on that basis, deny these allegations.

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

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

17 **COUNT I**

18 **INFRINGEMENT OF THE '771 PATENT**

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

21 13. Denied.

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

24 15. Denied.

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

28

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 Second Amended Complaint. Defendants deny  
7 the 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 (Dkt. 55), 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.

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