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

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
18 **SOUTHERN DIVISION**
19

20 DOCUMENT SECURITY SYSTEMS,
21 INC.,

22 Plaintiff,

23 v.

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

26 Defendants.
27
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CASE NO. 8:17-CV-00981-JVS-JCG

**DECLARATION OF ANANT K. SARASWAT
IN SUPPORT OF DEFENDANTS' MOTION
TO STAY PENDING *INTER PARTES* REVIEW**

Judge: Honorable James V. Selna
Date: March 26, 2018
Time: 1:30 pm
Courtroom: 10C

1 I, Anant K. Saraswat, 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 Stay
6 Pending *Inter Partes* Review.

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. Document Security Systems, Inc. (“DSS”) has only produced the
11 patents and their file histories thus far in discovery; Seoul has produced the prior
12 art cited in its invalidity contentions, served on February 5, 2018, as well as some
13 of DSS’s publically-available financial documents.

14 5. DSS served its first set of interrogatories and requests for production
15 on January 24; Seoul served the same on DSS on February 2. The parties have not
16 yet negotiated a protective order.

17 6. Neither party has noticed or taken any depositions.

18 7. Attached hereto as Exhibit A is a true and correct copy of DSS’s
19 Disclosure Of Asserted Claims And Infringement Contentions.

20 8. Attached hereto as Exhibit B is a true and correct copy of DSS’s 2017
21 Third Quarter 10-Q Report.

22 9. Attached hereto as Exhibit C is a true and correct copy of DSS’s
23 Proceeds Investment Agreement.

24 10. Attached hereto as Exhibit D is a true and correct copy of the
25 Decision to Institute *Inter Partes* Review in SK Hynix Inc.’s IPR Petition against
26 DSS Technology challenging 1-12 of U.S. Patent No. 6,784,552.

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1 11. Attached hereto as Exhibit E is a true and correct copy of SK Hynix
2 and DSS Technology's Joint Motion to Terminate *Inter Partes* Review of claims
3 1-12 of U.S. Patent No. 6,784,552.

4 12. Attached hereto as Exhibit F is a true and correct copy of the Final
5 Written Decision in Apple, Inc.'s ("Apple's") IPR petition against DSS
6 Technology Management, Inc. ("DSS Technology") challenging claims 1-4 of U.S.
7 Patent No. 6,128,290.

8 13. Attached hereto as Exhibit G is a true and correct copy of the Final
9 Written Decision in Apple's IPR petition against DSS Technology challenging
10 claims 6, 7, 9, and 10 of U.S. Patent No. 6,128,290.

11 14. Attached hereto as Exhibit H is a true and correct copy of the Final
12 Written Decision in Intel Corporation's and Qualcomm Incorporated's IPR petition
13 against DSS Technology challenging claims 8-12 of U.S. Patent No. 6,784,552.

14 15. Attached hereto as Exhibit I is a true and correct copy of the Final
15 Written Decision in Intel Corporation's and Qualcomm Incorporated's IPR petition
16 against DSS Technology challenging claims 1-7 of U.S. Patent No. 6,784,552.

17 16. Attached hereto as Exhibit J is a true and correct copy of the Final
18 Written Decision in Intel Corporation's and Qualcomm Incorporated's IPR petition
19 against DSS Technology challenging claims 7-12, 15, and 17 of U.S. Patent No.
20 5,965,924.

21 17. Attached hereto as Exhibit K is a true and correct copy of the Final
22 Written Decision in Intel Corporation's and Qualcomm Incorporated's IPR petition
23 against DSS Technology challenging claims 1-6, 13, 14, and 16 of U.S. Patent No.
24 5,965,924.

25 18. Attached hereto as Exhibit L is a true and correct copy of the Final
26 Written Decision in Samsung Electronics Co., Ltd.'s IPR petition against DSS
27 Technology challenging claims 1-12 of U.S. Patent No. 6,784,552.

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1 19. Attached hereto as Exhibit M is a true and correct copy of Judge
2 Schroeder's Order Granting Stay of Intel Litigation.

3 20. Attached hereto as Exhibit N is a true and correct copy of Judge
4 Gilstrap's Order Granting Stay of Qualcomm Litigation.

5 21. Attached hereto as Exhibit O is a true and correct copy of Seoul's IPR
6 petition against Document Security Systems, Inc. ("DSS") challenging claims 1-9
7 of U.S. Patent No. 6,949,771, filed on December 3, 2017.

8 22. Attached hetero as Exhibit P is a true and correct copy of Seoul's IPR
9 petition against DSS challenging claims 1-3 of U.S. Patent No. 7,256,486, filed on
10 December 21, 2017.

11 23. Attached hereto as Exhibit Q is a true and correct copy of Seoul's IPR
12 petition against DSS challenging claims 1, 6, 7, 8, 15 and 17 of U.S. Patent No.
13 7,524,087, filed on January 25, 2018.

14 24. Attached hereto as Exhibit R is a true and accurate copy of Judge
15 Carney's Order Granting Stay in Boston Sci. Corp. v. Edwards Lifesciences Corp.,
16 No. SACV 16-00730-CJC (GJSx) (C.D. Cal Sept. 8, 2017).

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18 I declare under penalty of perjury under the laws of the United States that
19 the foregoing is true and correct. Executed this 26th day of February, 2018.

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Anant K. Saraswat (*pro hac vice*)

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