Exhibit Q

UNITED STATES	PATENT AND TRA	DEMARK OFFICE
REFORE THE PA	ATENT TRIAL AND	- APPEAL ROARD
BLI ORE THE I		

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

Petitioners

v.

DOCUMENT SECURITY SYSTEMS, INC.

Patent Owner

Case No. IPR2018-00522 U.S. Patent No. 7,524,087

PETITION FOR INTER PARTES REVIEW OF
U. S. PATENT NO. 7,524,087 UNDER
35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 ET SEQ.



TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	REQUIREMENTS FOR AN INTER PARTES REVIEW PETITION	
III.	IDENTIFICATION OF CLAIMS BEING CHALLENGED (§ 42.104(B))	
IV.	THE PURPORTED INVENTION	
V.	SUMMARY OF THE RELEVANT PROSECUTION HISTORY	
VI.	CLAIM CONSTRUCTION	10
A.	"pocket"/"cavity"	11
B.	"lead receiving compartments are formed in the peripheral sidewall	of the
	reflector housing"/"said reflector housing further having a periph	ieral
	sidewall, said peripheral sidewall having a plurality of lead received	ving
	compartments formed therein"	14
VII.	PERSON HAVING ORDINARY SKILL IN THE ART	19
VIII.	BRIEF DESCRIPTION OF THE PRIOR ART	19
A.	Japanese Patent Application Publication No. 2001-118868 ("Kyowa"	")19
B.	United States Patent Application Publication No. 2004/0206964	
	("Matsumura")	23
C.	United States Patent 6,834,977 ("Suehiro")	25
D.	United States Patent 6,653,661 ("Okazaki '661")	27
E.	United States Patent Application No. 2008/0054287 ("Oshio")	29
IX.	PRECISE REASONS FOR THE RELIEF REQUESTED	30
A.	Ground 1: Claims 1, 6-8, 15, and 17 Are Rendered Obvious by	
	Kyowa	30
1	. Independent Claim 1	30
2	Dependent Claim 6	39
3	Dependent Claim 7	40



Case 8:17-cv-00981-JVS-JCG Document 57-18 Filed 02/26/18 Page 4 of 76 Page ID #:1499

4.	Dependent Claim 8	.40	
5.	Independent Claim 15	.40	
6.	Dependent Claim 17	.43	
В.	Ground 2: Claims 1, 6-8, 15, and 17 are rendered obvious by		
	Matsumura	.44	
1.	Independent Claim 1	.44	
2.	Dependent Claim 6	.50	
3.	Dependent Claim 7	.51	
4.	Dependent Claim 8	.51	
5.	Independent Claim 15	.51	
6.	Dependent Claim 17	.54	
C.	Ground 3: Claims 1, 6-8, 15, and 17 Are, in the Alternative, Rendered		
	Obvious by Matsumura in View of Suehiro	.54	
1.	"Reflector Housing" (Elements 1[b] and 15[a])	.55	
2.	"Lead Receiving Compartment" (Elements 1[e] and 15[c]) "Ribs"		
	(Claim 6)	.56	
D.	Ground 4: Claims 1, 6-8, 15, and 17 Are, in the Alternative, Rendered		
	Obvious by Matsumura in View of Oshio	.60	
<i>E</i> .	Ground 5: Claims 1, 6-8, 15, and 17 Are, in the Alternative, Rendered		
	Obvious by Kyowa in view of Okazaki '661	.63	
X.	CONCLUSION	.67	
CERT	IFICATE OF SERVICE		
CERT	IFICATE OF COMPLIANCE WITH 37 C.F.R. § 42.24		



PETITIONER'S EXHIBIT LIST

EXHIBIT	DESCRIPTION
1001	U.S. Patent No. 7,524,087 (087 patent)
1002	File History of U.S. Patent No. 7,524,087 (087 file History)
1003	Declaration of Michael Pecht, Ph.D. (Pecht)
1004	English translation of Japanese Design Patent No. D1223595 (Nichia)
1005	LED 2006 Toyoda Gosei catalog of Optoelectronic Products (Gosei)
1006	Patent Owner's contentions (Contentions)
1007	Merriam Webster's Collegiate Dictionary (10 th ed. 1997) pgs. 183, 234, 865, 897, 975, 1090 (Merriam Webster)
1008	Webster's Encyclopedia Unabridged Dictionary of the English Language (1996) pgs. 331, 416, 1441, 1491, 1610 and 1777 (Webster's Encyclopedia)
1009	English translation Japanese Patent Application Publication No. 2001-118868 (Kyowa)
1010	United States Patent Application Publication No. 2004/0206964 (Matsumura)
1011	United States Patent No. 6,834,977 (Suechiro)
1012	United States Patent No. 6,653,661 (Okazaki '661)
1013	English translation of Japanese Patent Application Publication No. 2007-189150 (Enomoto)
1014	United States Patent Application No. 2008/0054287 (Oshio)



DOCKET

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.

