

# Exhibit A

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9  
 10 **UNITED STATES DISTRICT COURT**  
 11 **CENTRAL DISTRICT OF CALIFORNIA**  
 12 **SOUTHERN DIVISION**

13  
 14 DOCUMENT SECURITY SYSTEMS,  
 15 INC., a New York corporation,

16 Plaintiff,

17 vs.

18 SEOUL SEMICONDUCTOR CO.,  
 19 LTD, a Korean corporation, and SEOUL  
 20 SEMICONDUCTOR, INC., a California  
 21 corporation.

22 Defendants.

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

**PLAINTIFF DOCUMENT  
 SECURITY SYSTEMS, INC.’S  
 DISCLOSURE OF ASSERTED  
 CLAIMS AND INFRINGEMENT  
 CONTENTIONS**

23 Plaintiff Document Security Systems, Inc. (“DSS”) provides this Disclosure  
 24 of Asserted Claims and Infringement Contentions to Defendants Seoul  
 25 Semiconductor, LTD., and Seoul Semiconductor, Inc. (collectively “Seoul” or  
 26 “Defendants”) in the above captioned case. This disclosure is made solely for the  
 27 purposes of this action.  
 28

RUSS, AUGUST & KABAT

1 Discovery in this matter is at a very early stage and is ongoing. No  
2 documents have yet been produced, no deposition testimony has been taken, and  
3 no written discovery responses have yet been served. DSS's investigation  
4 regarding these and other potential grounds of infringement is ongoing. This  
5 disclosure is therefore based upon information that DSS has been able to obtain  
6 publicly, together with DSS's current good faith beliefs and information regarding  
7 the Accused Instrumentalities, and is given without prejudice to DSS's right to  
8 obtain leave to supplement or amend its disclosure as additional facts are  
9 ascertained, analyses are made, research is completed, and claims are construed.

10 These disclosures are based at least in part upon DSS's present  
11 understanding of the meaning and scope of the claims of U.S. Patent Nos.  
12 6,949,771 ("the '771 patent"), 7,524,087 ("the '087 patent"), and 7,256,486 ("the  
13 '486 patent") (the "patents-in-suit") in absence of claim construction proceedings  
14 in this action. DSS reserves the right to seek leave to supplement or amend these  
15 disclosures if its understandings of the claims changes, including when the Court  
16 construes them in this action.

17 **I. Asserted Claims**

18 DSS is asserting claims 1, 2, 3, 4, 6 and 7 of the '771 patent, claims 1, 6, 7,  
19 8, 15 and 17 of the '087 patent, and claims 1, 2 and 3 of the '486 patent as well as  
20 all claims charted in the attached claim charts. The attached claim charts identify  
21 the specific claims asserted against each product and list all asserted claims.

22 **II. Accused Instrumentalities**

23 The Accused Instrumentalities include Defendants' current, past and future  
24 light emitting diode ("LED") products. For example, DSS provides the following  
25 non-exhaustive list of Defendants' current and past Accused Instrumentalities: the  
26 Seoul Semiconductor 801 series (Automotive) (including e.g., ELWT801-S,  
27 ELWT801-SM, EWT801-S, EWT801-SM, HWT801-S, HWT801-SM, LWT801-  
28 S, LWT801-SM, HBWT801G-HG, HBWT801-S, EGWT801G-S, ESBT801G-CF,

1 ESBT801-S, MSBT801G-B, MSBT801G-YF, MSBT801G-YF, IBT801-S,  
2 MIBT801-S, MBLT801-S, SBT801-S, EBT801-S, HBT801-S, LUY801-S,  
3 SUYT801-S, HYT801-S, EGT801-S, UYGT801S-KM, UPGT801-S, FAT801-S,  
4 LAT801-S, ERT801-S, HRT801-S, HRT801-SB, HRT801-SC, SRT801-S,  
5 WRT801-S), the Seoul Semiconductor 802 series (Automotive) (including e.g.,  
6 SAT802-SC, SDT802-SB, SYT802-SC), Seoul Semiconductor 802 series  
7 (including e.g., SAT802-SC, SDT802-SB, SYT802-SC), the Seoul Semiconductor  
8 825 Series LED, the Seoul Semiconductor 809 Series LED (including e.g.,  
9 EAT809-S, EBT809-S, EGT809-S, ELWT809-S, ELWT809-SM, EMIBT809-S,  
10 ERT809-S, ESKBT809-S, EWT809-S, EWT809-S05, EYT809-S, HYT809-S), the  
11 Seoul Semiconductor SFT722N-S, the Seoul Semiconductor MJT-4040 Series  
12 (including e.g., SAW09A0A and SAW09H0A), the Seoul Semiconductor Z Power  
13 LED – Z7, Z7-F Series, the Seoul Semiconductor Z Power LED, Z5 Series – Z5M,  
14 Z5P, Z5, Z5M1, Z5M2, Z5 Automotive (including e.g., SZ5-M0-W0-00, SZ5-M0-  
15 W0-C8, SZ5-M0-WN-C8, SZ5-M0-WM-C9, SZ5-M0-WW-C8, SZ5-M0-WW-C9,  
16 SZ5-M1-W0-00, SZ5-M1-W0-C8, SZ5-M1-WN-00, SZ5-M1-WN-C8, SZ5-M1-  
17 WW-C8, SZ5-M2-W0-00, SZ5-M2-W0-C8, SZ5-M2-WM-00, SZ5-M2-WN-C8,  
18 SZ5-M2-WW-00, SZ5-M2-WW-C8, SZ5-M2-WW-C9, SZ5-L1-W0-00, SZ5-MA-  
19 W0-00, SZ5-P0-W0-00, SZ5-P0-WN-00, SZA05A0A, SZR05A0A, SZW05A0B),  
20 and all predecessor and successor models, all products containing the same or  
21 similar features as those identified in the accompanying charts, and all products  
22 including or incorporating any of these products as components (such as  
23 luminaires, lighting fixtures, bulbs, or any other consumer product). The Accused  
24 Instrumentalities also include any product included in the attached claim charts not  
25 listed above.

26 In addition, upon information and belief, Defendants may accuse use or offer  
27 presently unknown methods and systems that infringe the patents-in-suit. While  
28 DSS has endeavored to identify Defendants' products with the accused features,

1 Defendants have more comprehensive knowledge of its product offerings,  
2 including past product offerings. DSS reserves the right to supplement this  
3 identification based on further discovery of additional products with the same or  
4 similar features.

5 **III. Accompanying Charts**

6 Charts identifying specifically where each limitation of each asserted claim  
7 is found within each Accused Instrumentality are attached to this disclosure. *See*  
8 Exhibits A – L. To the extent a chart is not directed to a specific product, DSS's  
9 infringement theories are disclosed by the charts directed toward the same product  
10 class. The accompanying charts also list all the Accused Instrumentalities  
11 including ones not listed above.

12 **IV. Indirect and Induced Infringement**

13 The attached charts contain an identification of direct infringement and a  
14 description of the acts of the alleged indirect infringers that contribute to or are  
15 inducing that direct infringement. In addition, Defendants are actively inducing  
16 others, such as their customers and end users of Accused Instrumentalities, services  
17 based thereupon, and related products and/or processes, to directly infringe each  
18 and every claim limitation of the asserted claims of the patents-in-suit. Defendants'  
19 customers and/or end users have directly infringed and are directly infringing each  
20 and every claim limitation of the asserted claims of the patents-in-suit. Defendants  
21 are also knowingly inducing their customers and/or end users to directly infringe  
22 the patents-in-suit, with the specific intent to encourage such infringement, and  
23 knowing that the induced acts constitute patent infringement. Defendants'  
24 inducement includes, for example, providing technical guides, product data sheets,  
25 demonstrations, software and hardware specifications, installation guides, and  
26 other forms of support that induce their customers and/or end users to directly  
27 infringe the patents-in-suit. The Accused Instrumentalities are designed in such a  
28 way that when they are used for their intended purpose, the user infringes the

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