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15 SEMICONDUCTOR CO., LTD and
SEOUL SEMICONDUCTOR, INC.
16

17 UNITED STATES DISTRICT COURT
18 CENTRAL DISTRICT OF CALIFORNIA
19 SOUTHERN DIVISION
20

21 DOCUMENT SECURITY SYSTEMS,
INC.,

22 Plaintiff,

23 v.

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

26 Defendants.
27
28

CASE NO. 8:17-CV-00981-JVS-JCG

**UPDATED MOTION INDEX FOR
DEFENDANTS' MOTION TO STAY
PENDING *INTER PARTES* REVIEW**

Judge: Honorable James V. Selna

Date: March 26, 2018

Time: 1:30 pm

Courtroom: 10C

1 Pursuant to the Order for Jury Trial Setting Dates; Preparation for Jury Trial;
 2 and Governing Attorney and Party Conduct at Trial (revised December 5th, 2013),
 3 Defendants Seoul Semiconductor Co., Ltd. and Seoul Semiconductor, Inc. hereby
 4 submit this Motion Index detailing their Motion to Stay Pending *Inter Partes*
 5 Review.

| Name of Pleading | Docket Number |
|---|---------------|
| Defendants' Notice of Motion and Motion to Stay Pending <i>Inter Partes</i> Review; Memorandum of Points and Authorities | 57 |
| Declaration of Anant K. Saraswat In Support of Defendants' Motion to Stay Pending <i>Inter Partes</i> Review | 57-1 |
| Exhibit A to Declaration of Anant K. Saraswat In Support of Defendants' Motion to Stay Pending <i>Inter Partes</i> Review (a true and correct copy of Document Security Systems, Inc.'s ("DSS's") Disclosure Of Asserted Claims And Infringement Contentions) | 57-2 |
| Exhibit B to Declaration of Anant K. Saraswat In Support of Defendants' Motion to Stay Pending <i>Inter Partes</i> Review (a true and correct copy of DSS's 2017 Third Quarter 10-Q Report) | 57-3 |
| Exhibit C to Declaration of Anant K. Saraswat In Support of Defendants' Motion to Stay Pending <i>Inter Partes</i> Review (a true and correct copy of DSS's Proceeds Investment Agreement) | 57-4 |
| Exhibit D to Declaration of Anant K. Saraswat In Support of Defendants' Motion to Stay Pending <i>Inter Partes</i> Review (a true and correct copy of the Decision to Institute <i>Inter</i> | 57-5 |

| | | |
|----|---|---------------|
| 1 | Name of Pleading | Docket Number |
| 2 | <i>Partes</i> Review in SK Hynix Inc.’s IPR Petition against DSS | |
| 3 | Technology Management, Inc. (“DSS Technology”) | |
| 4 | challenging 1-12 of U.S. Patent No. 6,784,552) | |
| 5 | Exhibit E to Declaration of Anant K. Saraswat In Support of | 57-6 |
| 6 | Defendants’ Motion to Stay Pending <i>Inter Partes</i> Review (a | |
| 7 | true and correct copy of SK Hynix and DSS Technology’s | |
| 8 | Joint Motion to Terminate <i>Inter Partes</i> Review of claims 1- | |
| 9 | 12 of U.S. Patent No. 6,784,552) | |
| 10 | Exhibit F to Declaration of Anant K. Saraswat In Support of | 57-7 |
| 11 | Defendants’ Motion to Stay Pending <i>Inter Partes</i> Review (a | |
| 12 | true and correct copy of the Final Written Decision in | |
| 13 | Apple, Inc.’s (“Apple’s”) IPR petition against DSS | |
| 14 | Technology challenging claims 1-4 of U.S. Patent No. | |
| 15 | 6,128,290) | |
| 16 | Exhibit G to Declaration of Anant K. Saraswat In Support | 57-8 |
| 17 | of Defendants’ Motion to Stay Pending <i>Inter Partes</i> Review | |
| 18 | (a true and correct copy of the Final Written Decision in | |
| 19 | Apple’s IPR petition against DSS Technology challenging | |
| 20 | claims 6, 7, 9, and 10 of U.S. Patent No. 6,128,290) | |
| 21 | Exhibit H to Declaration of Anant K. Saraswat In Support | 57-9 |
| 22 | of Defendants’ Motion to Stay Pending <i>Inter Partes</i> Review | |
| 23 | (a true and correct copy of the Final Written Decision in | |
| 24 | Intel Corporation’s and Qualcomm Incorporated’s IPR | |
| 25 | petition against DSS Technology challenging claims 8-12 of | |
| 26 | U.S. Patent No. 6,784,552) | |
| 27 | | |
| 28 | | |

| Name of Pleading | Docket Number |
|--|---------------|
| <p>1 Exhibit I to Declaration of Anant K. Saraswat In Support of</p> <p>2 Defendants' Motion to Stay Pending <i>Inter Partes</i> Review (a</p> <p>3 true and correct copy of the Final Written Decision in Intel</p> <p>4 Corporation's and Qualcomm Incorporated's IPR petition</p> <p>5 against DSS Technology challenging claims 1-7 of U.S.</p> <p>6 Patent No. 6,784,552)</p> | 57-10 |
| <p>8 Exhibit J to Declaration of Anant K. Saraswat In Support of</p> <p>9 Defendants' Motion to Stay Pending <i>Inter Partes</i> Review (a</p> <p>10 true and correct copy of the Final Written Decision in Intel</p> <p>11 Corporation's and Qualcomm Incorporated's IPR petition</p> <p>12 against DSS Technology challenging claims 7-12, 15, and</p> <p>13 17 of U.S. Patent No. 5,965,924)</p> | 57-11 |
| <p>14 Exhibit K to Declaration of Anant K. Saraswat In Support</p> <p>15 of Defendants' Motion to Stay Pending <i>Inter Partes</i> Review</p> <p>16 (a true and correct copy of the Final Written Decision in</p> <p>17 Intel Corporation's and Qualcomm Incorporated's IPR</p> <p>18 petition against DSS Technology challenging claims 1-6,</p> <p>19 13, 14, and 16 of U.S. Patent No. 5,965,924)</p> | 57-12 |
| <p>20 Exhibit L to Declaration of Anant K. Saraswat In Support of</p> <p>21 Defendants' Motion to Stay Pending <i>Inter Partes</i> Review (a</p> <p>22 true and correct copy of the Final Written Decision in</p> <p>23 Samsung Electronics Co., Ltd.'s IPR petition against DSS</p> <p>24 Technology challenging claims 1-12 of U.S. Patent No.</p> <p>25 6,784,552)</p> | 57-13 |
| <p>26 Exhibit M to Declaration of Anant K. Saraswat In Support</p> <p>27 of Defendants' Motion to Stay Pending <i>Inter Partes</i> Review</p> <p>28</p> | 57-14 |

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| 1 | Name of Pleading | Docket Number |
| 2 | (a true and correct copy of Judge Schroeder's Order | |
| 3 | Granting Stay of Intel Litigation) | |
| 4 | Exhibit N to Declaration of Anant K. Saraswat In Support | 57-15 |
| 5 | of Defendants' Motion to Stay Pending <i>Inter Partes</i> Review | |
| 6 | (a true and correct copy of Judge Gilstrap's Order Granting | |
| 7 | Stay of Qualcomm Litigation) | |
| 8 | Exhibit O to Declaration of Anant K. Saraswat In Support | 57-16 |
| 9 | of Defendants' Motion to Stay Pending <i>Inter Partes</i> Review | |
| 10 | (a true and correct copy of Seoul's IPR petition against DSS | |
| 11 | challenging claims 1-9 of U.S. Patent No. 6,949,771, filed | |
| 12 | on December 3, 2017) | |
| 13 | Exhibit P to Declaration of Anant K. Saraswat In Support of | 57-17 |
| 14 | Defendants' Motion to Stay Pending <i>Inter Partes</i> Review (a | |
| 15 | true and correct copy of Seoul's IPR petition against DSS | |
| 16 | challenging claims 1-3 of U.S. Patent No. 7,256,486, filed | |
| 17 | on December 21, 2017) | |
| 18 | Exhibit Q to Declaration of Anant K. Saraswat In Support | 57-18 |
| 19 | of Defendants' Motion to Stay Pending <i>Inter Partes</i> Review | |
| 20 | (a true and correct copy of Seoul's IPR petition against DSS | |
| 21 | challenging claims 1, 6, 7, 8, 15 and 17 of U.S. Patent No. | |
| 22 | 7,524,087, filed on January 25, 2018) | |
| 23 | Exhibit R to Declaration of Anant K. Saraswat In Support of | 57-19 |
| 24 | Defendants' Motion to Stay Pending <i>Inter Partes</i> Review (a | |
| 25 | true and correct copy of Judge Carney's Order Granting | |
| 26 | Stay in <u>Boston Sci. Corp. v. Edwards Lifesciences Corp.</u> , | |
| 27 | No. SACV 16-00730-CJC (GJSx) (C.D. Cal Sept. 8, 2017)) | |
| 28 | | |

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