#### UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD, Petitioners,

v.

DSS TECHNOLOGY MANAGEMENT, INC., Patent Owner.

> Case: IPR2014-01493 U.S. Patent No. 5,652,084

PATENT OWNER DSS TECHNOLOGY MANAGEMENT, INC.'S PRELIMINARY RESPONSE PURSUANT TO 37 C.F.R. §42.107

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	A.		enge #1: there is no reasonable likelihood that Jinbo could anticipate claims 5, and 16 of the '084 Patent		

	1.	According to Jinbo, both imaging layers are patterned using the same mask, whereas claims 1 and 15 require that each imaging layer is patterned in accordance with its own pattern		
	2.	Jinbo does not disclose the second patterned layer having a second feature distinct from the first feature of the first patterned layer		
	3.	Jinbo cannot anticipate dependent claims 2-8, 12, and 16 at least because Jinbo does not anticipate independent claims 1 and 15		
B.	becaus	nge #2: Claim 9 cannot be found obvious based on Jinbo in view of McColgin e Jinbo does not disclose several material limitations of claim 1 from which 9 depends		
C.	Matthe	nge #3: Claims 10 and 11 cannot be found obvious based on Jinbo in view of ews because Jinbo does not disclose several material limitations of claim 1 from claims 10 and 11 depend		
D.	Cooper	Challenge #4: Claims 13 and 14 cannot be found obvious based on Jinbo in view of Cooper because Jinbo does not disclose several material limitations of claim 1 from which claims 13 and 14 depend		
E.		nge #5: There is no reasonable likelihood that Hsue could anticipate claims 1- 12, 15, and 16 of the '084 Patent		
	1.	Hsue does not disclose "forming a second imaging layer <i>over</i> the first patterned layer"		
	2.	Hsue does not disclose that the first and the second patterned layers are formed in accordance with (2) two separate patterns		
	3.	Hsue does not disclose the second patterned layer having a second feature distinct from the first feature of the first patterned layer		
	4.	Hsue cannot anticipate dependent claims 2-7, 10, 12, and 16 at least because Hsue does not anticipate independent claims 1 and 15		
F.		nge #6: Claim 8 cannot be found obvious based on Hsue in view of Jinbo e Hsue does not disclose all limitations of claim 1		
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