

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

EVERLIGHT ELECTRONICS CO., LTD.
Petitioner

v.

DOCUMENT SECURITY SYSTEMS, INC.
Patent Owner

U.S. Patent No. 7,256,486

PETITION FOR *INTER PARTES* REVIEW OF

U. S. PATENT NO. 7,256,486

UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 *ET SEQ.*

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CERTIFICATE OF SERVICE

CERTIFICATE OF COMPLIANCE WITH 37 C.F. R. § 42.24

PETITIONER'S EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent No. 7,256,486 (“486 patent”)
1002	Prosecution History of U.S. Patent No. 7,256,486 (“Prosecution History”)
1003	Declaration of Eric Bretschneider, PhD
1004	Modern Dictionary of Electronics (7th ed. 1999)) pg. 239 and 467
1005	Microchip Fabrication (4th ed. 2000) pg. 396
1006	Pecht <i>et al.</i> “Plastic Encapsulated Microelectronics” (1995) pg. 459
1007	Merriam Webster’s Collegiate Dictionary (10th ed. 1997) pg. 730
1008	Japanese Patent Application Publication No. 2003-17754, English translation of Japanese Patent Application Publication No. 2003-17754 and Translator Declaration (Rohm)
1009	Japanese Patent Application Publication No. 2001-352102 English translation of Japanese Patent Application Publication No. 2001-352102 and Translator Declaration (Matsushita)
1010	U.S. Patent No. 5,376,580 (“Kish”)
1011	U.S. Patent No. 5,523,589 (“Edmond 589”)
1012	U.S. Patent No. 6,791,119 (“Slater”)
1013	U.S. Patent No. 5,416,342 (“Edmond 342”)
1014	CV of Eric Bretschneider, PhD
1015	Pecht, M., R. Agarwal, P. McCluskey, T. Dishongh, S. Javadpour, and R. Mahajan, <i>Electronic Packaging Materials and their Properties</i> , CRC Press, Boca Raton, FL, 1999 pg. 37 (“Electronic Packaging”)

I. INTRODUCTION

On behalf of Everlight Electronics Co., Ltd. (“Petitioner”) and in accordance with 35 U.S.C. § 311 and 37 C.F.R. § 42.100, *inter partes* review of claims 1-3 of United States Patent No. 7,256,486 to Lee *et al.*, entitled “Packaging Device For Semiconductor Die, Semiconductor Device Incorporating Same And Method Of Making Same” (hereinafter “the ’486 patent”) is requested. This Petition establishes that Petitioner has a reasonable likelihood of prevailing with respect to at least one of claims 1-3. A copy of the ’486 patent is provided as Ex. 1001.

II. REQUIREMENTS FOR AN *INTER PARTES* REVIEW PETITION

A. Grounds for Standing (37 C.F.R. § 42.104(a))

Petitioner certifies that the ’486 patent is available for *inter partes* review and that Petitioner and the Real Parties in Interest are not barred or estopped from requesting an *inter partes* review challenging claims 1-3 of the ’486 patent on the grounds identified herein.

B. Notice of Lead and Backup Counsel and Service Information (37 C.F.R. § 42.8(b)(3))

Lead Counsel: John F. Rabena (Reg. No. 38,584) jrabena@sughrue.com 2100 Pennsylvania Ave., N.W. Suite 800 Washington, DC 200037	Backup Counsel: William H. Mandir (Reg. No. 32,156) wmandir@sughrue.com 2100 Pennsylvania Ave., N.W. Suite 800 Washington, DC 200037
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