

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

COLT INTERNATIONAL CLOTHING
INC. d/b/a COLT LED,

Plaintiff,

v.

QUASAR SCIENCE LLC,
CINELEASE, INC., SONY PICTURES
ENTERTAINMENT INC., WARNER
BROS. ENTERTAINMENT INC., and
FOX CORPORATION,

Defendants.

Civil Action No. 22-cv-213-GBW

PLAINTIFF’S INITIAL INFRINGEMENT CONTENTIONS

Pursuant to Section 3(c) of the Scheduling Order entered by the Court on December 2, 2022 (D.I. 82), Plaintiff, Colt International Clothing Inc. d/b/a Colt LED (“Plaintiff”), provides its initial claim charts to Defendants, Quasar Science LLC, Cinelease, Inc., Sony Pictures Entertainment Inc., Warner Bros. Entertainment Inc., and Fox Corporation (collectively, “Defendants”), with respect to Defendants’ infringement of U.S. Patent Nos. 9,719,642 (“the ‘642 patent”), 9,845,924 (“the ‘924 patent”), 10,197,224 (“the ‘224 patent”), 10,411,582 (“the ‘582 patent”), 10,566,895 (“the ‘895 patent”), 10,718,473 (“the ‘473 patent”), and 11,293,600 (“the ‘600 patent”) (the ‘642, ‘924, ‘224, ‘582, ‘895, ‘473, and ‘600 patents are hereinafter collectively referred to as the “Asserted Patents”).

Plaintiff provides these initial claim charts before claim construction disclosures, the completion of fact or expert discovery, and the Court’s claim construction ruling. Plaintiff’s contentions are not an admission, adoption, or waiver of any particular claim construction, and Plaintiff reserves all rights with respect to claim construction. These disclosures are preliminary,

based primarily upon information publicly available to Plaintiff, and are potentially different from the final infringement contentions Plaintiff will serve in this litigation once Defendants have provided further discovery concerning their “Accused Products”.¹ Thus, Plaintiff’s investigation of the nature and extent of Defendants’ infringement is necessarily ongoing, and Plaintiff reserves the right to supplement or modify these disclosures as new information becomes available through discovery or other investigation as provided for by the Federal Rules of Civil Procedure and the Local Rules.

Plaintiff contends that Defendants have directly infringed and continue to directly infringe, literally and/or under the doctrine of equivalents, the Asserted Patents in violation of 35 U.S.C. § 271. Plaintiff also contends that each element of each asserted claim is literally met. To the extent that any claim element is found not to be literally met, Plaintiff contends that the Accused Products embody such claim elements under the doctrine of equivalents because there are no substantial differences for each claim element, and the Accused Products perform substantially the same function, in substantially the same way, to achieve substantially the same result.

Dated: February 27, 2023

Respectfully submitted,

FARNAN LLP

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¹ Defendants’ Accused Products are defined in the accompanying claim charts on a per-patent (and, where appropriate, per-claim) basis. The Accused Products include the specific model numbers set forth in these claim charts as well as other models with the same or substantially the same names and functionality.

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*Attorneys for Plaintiff Colt International
Clothing, Inc. d/b/a Colt LED*

Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights

As used in the following claim charts, the phrase “Accused Products” includes the following products based upon the asserted claim.

Claims	Accused Products
1, 3, 4, 7	Q25R2, Q50R2, Q100R2
8	Q25R2 and Q50R2
9-13, 23, 25, 26, 28, 29	Q25R2, Q50R2, Q100R2
30	Q50R2, Q100R2
31-39, 41	Q25R2, Q50R2, Q100R2
42	Q50R2, Q100R2
43-45	Q25R2, Q50R2, Q100R2

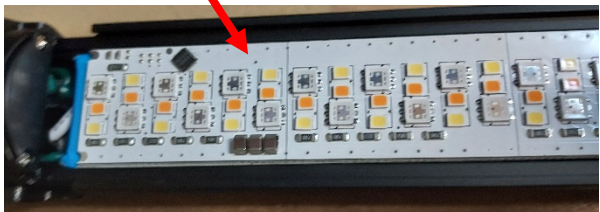
Claim 1	Accused Products
An LED lighting device configured for providing light suitable for a commercial image recording, the LED lighting device comprising:	The Accused Products are lighting devices suitable for commercial image recording. ULTRA LOW PROFILE WITH NEW PIXEL CONTROL Introducing the R2, the sequel to the original Rainbow Linear LED Light. This design adds a multitude of new features, while keeping the same sleek, sturdy low-profile shape as many of the legacy Quasar products you have grown to love. The R2 is offered in three lengths: the Q100R2 at 91 in/232 cm, Q50R2 at 47 in/120 cm and Q25R2 at 23 in/59 cm. All built with multi-pixel control without compromising the clean color or high output that we have always been known for. The Q25R2 offers 10 pixels, the Q50R2 has 24 pixels, and the Q100R2 allows for 48 separate pixels.
a support structure;	The Accused Products include a support structure (red arrow). 
a housing for the support structure;	The Accused Products include a housing that encloses the support structure. 
an array of LED emitting devices mounted on the support structure,	The Accused Products include an array of LEDs mounted on the support structure.

Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights

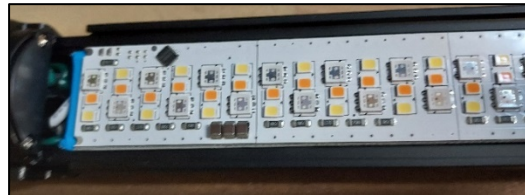
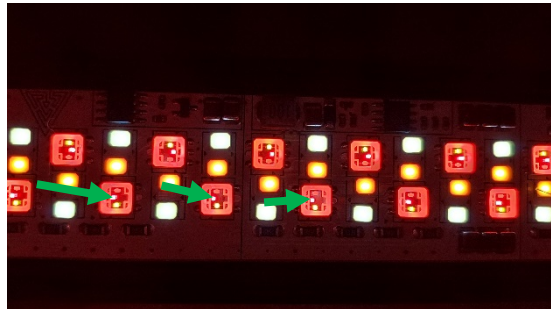
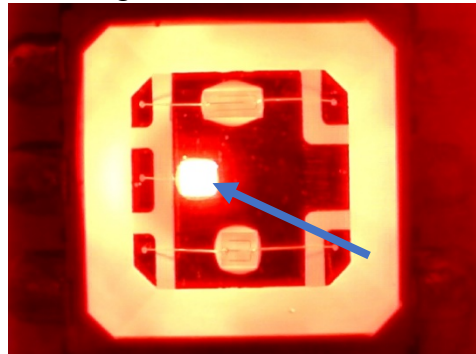
Claim 1	Accused Products																																																						
wherein the array of LED emitting devices is configured to emit five different colors of light and comprises:	 The Accused Products include LED emitting devices that emit red, green, blue, bright white and warm white/amber. <table><tr><th colspan="6">Profile 14</th></tr><tr><th colspan="6">RGBTD 16 bit</th></tr><tr><th colspan="6">10 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th><th>Description</th><th>Default % / DMX</th></tr><tr><td>1/2</td><td>Red</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>3/4</td><td>Green</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>5/6</td><td>Blue</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>7/8</td><td>2000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>9/10</td><td>6000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr></table> 	Profile 14						RGBTD 16 bit						10 DMX Channels per Pixel						Channel	Function	Value	Percentage	Description	Default % / DMX	1/2	Red	0-65,535	0-100		0	3/4	Green	0-65,535	0-100		0	5/6	Blue	0-65,535	0-100		0	7/8	2000k	0-65,535	0-100		0	9/10	6000k	0-65,535	0-100		0
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a first set of LED emitting elements configured to emit light of a first color;	The Accused Products have a first set of LEDs that emit red light.  <table><tr><th colspan="6">Profile 14</th></tr><tr><th colspan="6">RGBTD 16 bit</th></tr><tr><th colspan="6">10 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th><th>Description</th><th>Default % / DMX</th></tr><tr><td>1/2</td><td>Red</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>3/4</td><td>Green</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>5/6</td><td>Blue</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>7/8</td><td>2000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>9/10</td><td>6000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr></table>	Profile 14						RGBTD 16 bit						10 DMX Channels per Pixel						Channel	Function	Value	Percentage	Description	Default % / DMX	1/2	Red	0-65,535	0-100		0	3/4	Green	0-65,535	0-100		0	5/6	Blue	0-65,535	0-100		0	7/8	2000k	0-65,535	0-100		0	9/10	6000k	0-65,535	0-100		0
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a second set of LED emitting elements configured to emit light of a second color;	The Accused Products have a second set of LEDs that emit green light.																																																						

Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights

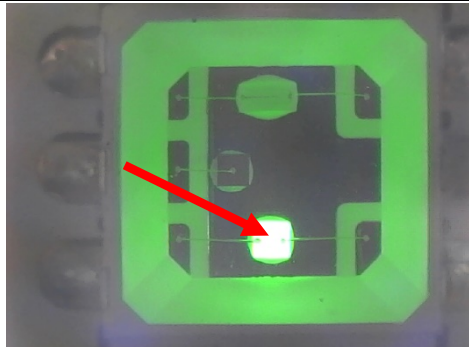
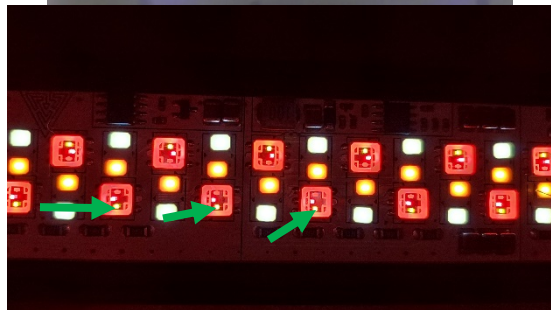
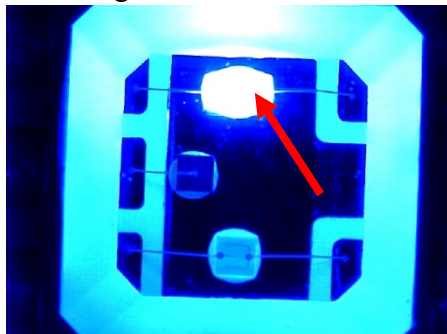
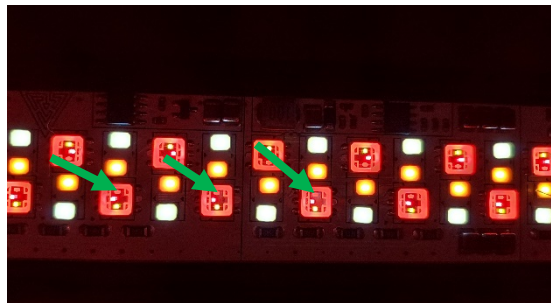
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a third set of LED emitting elements configured to emit light of a third color;	The Accused Products have a third set of LEDs that emit blue light.  																																																						

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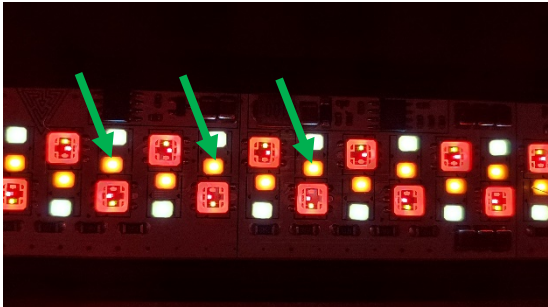
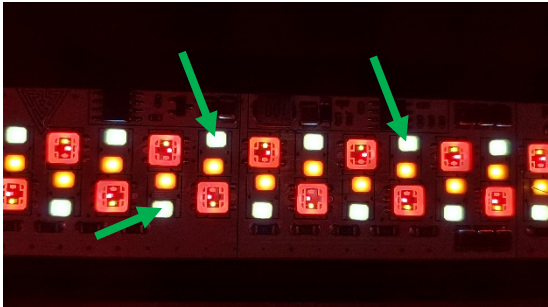
Claim 1	Accused Products																																																						
a fourth set of LED emitting elements configured to emit light of at a fourth color; and	The Accused Products have a fourth set of LEDs that emit warm white/amber light.  <table><thead><tr><th colspan="6">Profile 14</th></tr><tr><th colspan="6">RGBTD 16 bit</th></tr><tr><th colspan="6">10 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th><th>Description</th><th>Default % / DMX</th></tr></thead><tbody><tr><td>1/2</td><td>Red</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>3/4</td><td>Green</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>5/6</td><td>Blue</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>7/8</td><td>2000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>9/10</td><td>6000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr></tbody></table>	Profile 14						RGBTD 16 bit						10 DMX Channels per Pixel						Channel	Function	Value	Percentage	Description	Default % / DMX	1/2	Red	0-65,535	0-100		0	3/4	Green	0-65,535	0-100		0	5/6	Blue	0-65,535	0-100		0	7/8	2000k	0-65,535	0-100		0	9/10	6000k	0-65,535	0-100		0
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a fifth set of LED emitting elements configured to emit a broad-spectrum white light within a predetermined Kelvin temperature range; and	The Accused Products have a fifth set of LEDs that emit broad-spectrum bright white light.  <table><thead><tr><th colspan="6">Profile 14</th></tr><tr><th colspan="6">RGBTD 16 bit</th></tr><tr><th colspan="6">10 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th><th>Description</th><th>Default % / DMX</th></tr></thead><tbody><tr><td>1/2</td><td>Red</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>3/4</td><td>Green</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>5/6</td><td>Blue</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>7/8</td><td>2000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>9/10</td><td>6000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr></tbody></table>	Profile 14						RGBTD 16 bit						10 DMX Channels per Pixel						Channel	Function	Value	Percentage	Description	Default % / DMX	1/2	Red	0-65,535	0-100		0	3/4	Green	0-65,535	0-100		0	5/6	Blue	0-65,535	0-100		0	7/8	2000k	0-65,535	0-100		0	9/10	6000k	0-65,535	0-100		0
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a controller coupled to the array of LED emitting devices and	The Accused Products include a controller coupled to the LED array.																																																						

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U.S. Patent No. 10,197,224 by Rainbow 2 Lights

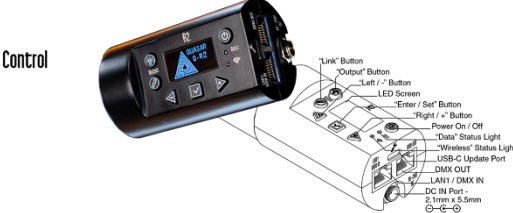
Claim 1	Accused Products																		
																			
[controller] configured to receive commands for operating select ones of the LED emitting devices with varying amounts of power to produce light consisting of varying amounts of the five different colors provided by the first, second, third, fourth, and fifth sets of LED emitting elements to produce many different colors outputted from the lighting device, and	The controller of the Accused Products is configured to receive commands. Button Shortcuts Min / Max Value Jump: On parameter menus such as Intensity, Color Temperature, Saturation, Hue, and Effects Parameters, While pressing and holding to increase the value, tapping will jump to the next value or max value. While pressing and holding to decrease the value, tapping will jump to the next value or minimum value. Enable/Disable Status Lights: Press and hold for 5 seconds to disable the status lights. Press again for 5 seconds to enable. Enable/Disable RDM: Press and hold for 2 seconds to disable RDM. Press again for 2 seconds to enable. Enable/Disable Wireless: Press and hold for 2 seconds to disable all Wireless Functions. Press again for 2 seconds to enable. Reset to Default: Press and hold for 3 seconds to reset the light to Default settings. Link Button: RX Mode - Press and hold to unpair the light. TX Mode - Tap to send pairing signal. Wireless Menu: Double press to open the Wireless Menu. Status Screen: Double press to return to the Status Screen. When on the Status Screen, Single press to display additional info. Control  The controller of the Accused Products is configured to receive commands relating to the operating the five colors with varying intensities to produce many different colors from the Accused Products. Main Menu - Manual Mode <table border="0"> <tr> <td>> Intensity</td> <td>0 to 100% by 1%</td> </tr> <tr> <td>> Color Temp</td> <td>1,750K to 10,000K by 1 Just Notable Difference</td> </tr> <tr> <td>> +/- Green</td> <td>-G 100 to G 0 to +100 G -- Ex. +G 25 = 1/4 +Green, -G 50 = 1/2 -Green (Magenta).</td> </tr> <tr> <td>> Saturation</td> <td>0 to 100% by 1%</td> </tr> <tr> <td>> Hue</td> <td>0° to 360°</td> </tr> <tr> <td>> CT Preset</td> <td>3,200K - 4,300K - 5,600K - 6,500K(D65) - 7,500K(D75) - 10,000K - 2,000K - 2,500K - 3,000K</td> </tr> <tr> <td>> Color Preset</td> <td>Red - Orange - Yellow - Green - Cyan - Blue - Violet - Magenta</td> </tr> <tr> <td>> Effects</td> <td>Rainbow - Short Circuit - Paparazzi - Strobe - Fire - Emergency Lights - Demo* (See Page 17-18)</td> </tr> <tr> <td>> Config</td> <td>Light Settings (See Page 11)</td> </tr> </table> *Check this website for newly added effects	> Intensity	0 to 100% by 1%	> Color Temp	1,750K to 10,000K by 1 Just Notable Difference	> +/- Green	-G 100 to G 0 to +100 G -- Ex. +G 25 = 1/4 +Green, -G 50 = 1/2 -Green (Magenta).	> Saturation	0 to 100% by 1%	> Hue	0° to 360°	> CT Preset	3,200K - 4,300K - 5,600K - 6,500K(D65) - 7,500K(D75) - 10,000K - 2,000K - 2,500K - 3,000K	> Color Preset	Red - Orange - Yellow - Green - Cyan - Blue - Violet - Magenta	> Effects	Rainbow - Short Circuit - Paparazzi - Strobe - Fire - Emergency Lights - Demo* (See Page 17-18)	> Config	Light Settings (See Page 11)
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> Config	Light Settings (See Page 11)																		
further comprising an LED driver, the LED driver configured to selectively provide electrical power to the array of LED emitting devices;	The light produced by the Accused Products consists of light from the five sets of LEDs. The Accused Products include an LED that selectively provides power to the array of LEDs.																		

Exhibit 12 – Patent Infringing Claim Chart for Claims of
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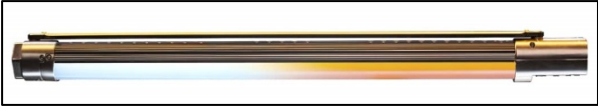
Claim 1	Accused Products
	
wherein the housing has a linear form factor substantially that of a fluorescent tube having an axial direction and having a diameter of no greater than about 41 mm, and	The housing of the Accused Products has the shape of a fluorescent tube.  The diameter of the tube is approximately 1.5 inches.  1.5 inches is 38.1 mm.
further comprising an electrical input connection for receiving input power,	The housings of the Accused Products include electrical connections for receiving power. 
wherein the input connection is in electrical communication with the LED driver, and	In order to provide power to the LEDs, the input connection is in electrical communication with the LED driver.
wherein the housing has opposite ends and	The housing has opposite ends (red arrows).

Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights

Claim 1	Accused Products
	
the support structure is in a form of an elongated and narrow surface extending in the axial direction and	The Accused Products have a support structure (red arrow) that is long with a narrow surface. 
the housing having a top side and a bottom side which each extend in the axial direction, and	The housing has a top side (red arrow) and a bottom side (green arrow). The top and bottom sides extend in an axial direction. 
wherein the LEDs are configured to emit light from the top side of the housing along a length of the housing between the opposite ends, and	In the Accused Products, the LEDs emit light from the top side of the housing between the opposite ends. 
the top side of the housing has a diffusion cover extending the axial length of the support between the ends.	The top side of the housing has a diffusion cover that extends between the ends. 

Claim 3	Accused Products																																				
The LED lighting device of claim 1, wherein the LED driver is adapted for selectively driving each of the first set, second set, third set, fourth set and fifth set of LED emitting elements in increments of about 1/255 to selectively produce at least 255 different colors from the lighting device.	In the Accused Products, the LEDs are adapted to be driven in increments of about 1/255. <table><tr><th colspan="4">Profile 13</th></tr><tr><th colspan="4">RGBTD 8 bit</th></tr><tr><th colspan="4">5 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th></tr><tr><td>1</td><td>Red</td><td>0-255</td><td>0-100</td></tr><tr><td>2</td><td>Green</td><td>0-255</td><td>0-100</td></tr><tr><td>3</td><td>Blue</td><td>0-255</td><td>0-100</td></tr><tr><td>4</td><td>2000k</td><td>0-255</td><td>0-100</td></tr><tr><td>5</td><td>6000k</td><td>0-255</td><td>0-100</td></tr></table>	Profile 13				RGBTD 8 bit				5 DMX Channels per Pixel				Channel	Function	Value	Percentage	1	Red	0-255	0-100	2	Green	0-255	0-100	3	Blue	0-255	0-100	4	2000k	0-255	0-100	5	6000k	0-255	0-100
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Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights

Claim 4	Accused Products																																				
The LED lighting device of claim 3, wherein the LED driver is adapted for selectively driving each of the first set, second set, third set, fourth set and fifth set of LED emitting elements in response to DMX signals from an external computer console or lighting control board to selectively produce the at least 255 different colors of an entertainment industry color wheel emitted from the lighting device.	In the Accused Products, the LEDs are adapted to be driven in increments of about 1/255 based on DMX signals from a remote computer. <table><tr><th colspan="4">Profile 13</th></tr><tr><th colspan="4">RGBTD 8 bit</th></tr><tr><th colspan="4">5 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th></tr><tr><td>1</td><td>Red</td><td>0-255</td><td>0-100</td></tr><tr><td>2</td><td>Green</td><td>0-255</td><td>0-100</td></tr><tr><td>3</td><td>Blue</td><td>0-255</td><td>0-100</td></tr><tr><td>4</td><td>2000k</td><td>0-255</td><td>0-100</td></tr><tr><td>5</td><td>6000k</td><td>0-255</td><td>0-100</td></tr></table> Status Lights Wired  Data DMX Mode / Data Received Data: Red / Wireless: Off  Data Ethernet Mode / Data Received Data: Yellow / Wireless: Off Wireless  Data Wireless DMX Data: Red / Wireless: Green (Or Universe Color)  Data WiFi Mode (Art-Net over WiFi) Data: Yellow / Wireless: Magenta  Data WiFi Access Point Mode (Art-Net over WiFi) Data: Yellow / Wireless: Orange  Data Bluetooth Mode Data: Blue / Wireless: Blue	Profile 13				RGBTD 8 bit				5 DMX Channels per Pixel				Channel	Function	Value	Percentage	1	Red	0-255	0-100	2	Green	0-255	0-100	3	Blue	0-255	0-100	4	2000k	0-255	0-100	5	6000k	0-255	0-100
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Claim 7	Accused Products
The LED lighting device of claim 1, wherein the fluorescent tube light has a substantially T12 form.	A T12 tube has a diameter of 1.5 inches (38.1mm). The housing of the Accused Products has the shape of a fluorescent tube.  The diameter of the tube is approximate 1.5 inches.

Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights

Claim 7	Accused Products
	 1.5 inches is 38.1 mm.
Claim 8	Accused Products
The LED lighting device of claim 1, wherein the fluorescent tube light has a substantially T12 form and is about one to four feet long.	A T12 tube has a diameter of 1.5 inches (38.1mm). The housing of the Accused Products has the shape of a fluorescent tube.  The diameter of the tube is approximate 1.5 inches.  1.5 inches is 38.1 mm. The Accused Products have lengths of two feet or four feet.

Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights

Claim 8	Accused Products
	924-2301 RAINBOW 2 \$ 665.00 Length 2ft / 0.6m 4ft / 1.2m 8ft / 2.4m

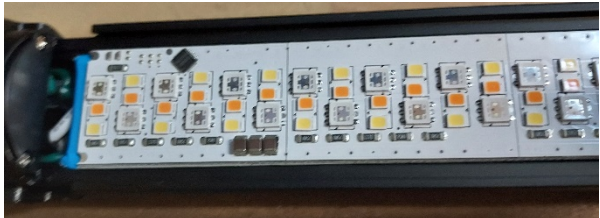
Claim 9	Accused Products																																				
The LED lighting device of claim 1, wherein at least one of the colors of the LEDs is amber.	The Accused Products have a 2000K LED that produce an amber color of warm white light. <table><tr><th colspan="4">Profile 13</th></tr><tr><th colspan="4">RGBTD 8 bit</th></tr><tr><th colspan="4">5 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th></tr><tr><td>1</td><td>Red</td><td>0-255</td><td>0-100</td></tr><tr><td>2</td><td>Green</td><td>0-255</td><td>0-100</td></tr><tr><td>3</td><td>Blue</td><td>0-255</td><td>0-100</td></tr><tr><td>4</td><td>2000k</td><td>0-255</td><td>0-100</td></tr><tr><td>5</td><td>6000k</td><td>0-255</td><td>0-100</td></tr></table>	Profile 13				RGBTD 8 bit				5 DMX Channels per Pixel				Channel	Function	Value	Percentage	1	Red	0-255	0-100	2	Green	0-255	0-100	3	Blue	0-255	0-100	4	2000k	0-255	0-100	5	6000k	0-255	0-100
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Claim 10	Accused Products																																				
The LED lighting device of claim 1, wherein the first, second, third and fourth LEDs are red, green, blue and amber, respectively.	The Accused Products have a red, green, blue, and 2000K LEDs that would produce an amber color of warm white light. <table><tr><th colspan="4">Profile 13</th></tr><tr><th colspan="4">RGBTD 8 bit</th></tr><tr><th colspan="4">5 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th></tr><tr><td>1</td><td>Red</td><td>0-255</td><td>0-100</td></tr><tr><td>2</td><td>Green</td><td>0-255</td><td>0-100</td></tr><tr><td>3</td><td>Blue</td><td>0-255</td><td>0-100</td></tr><tr><td>4</td><td>2000k</td><td>0-255</td><td>0-100</td></tr><tr><td>5</td><td>6000k</td><td>0-255</td><td>0-100</td></tr></table>	Profile 13				RGBTD 8 bit				5 DMX Channels per Pixel				Channel	Function	Value	Percentage	1	Red	0-255	0-100	2	Green	0-255	0-100	3	Blue	0-255	0-100	4	2000k	0-255	0-100	5	6000k	0-255	0-100
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Claim 11	Accused Products
The LED lighting device of claim 1, wherein among the colors the driver is configured to selectively produce are white light in each of daylight and tungsten temperature ranges.	The Accused Products are configured to produce white light in the daylight and tungsten temperature ranges.

Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights

Claim 11	Accused Products																																				
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Claim 12	Accused Products
The LED lighting device of claim 1, wherein the first, second, third, fourth and fifth LEDs are arranged substantially in a repeating matrix pattern along the length of the axial direction.	In the Accused Products the first, second, third fourth and fifth LEDs are arranged in a repeating pattern along the length of the light. 

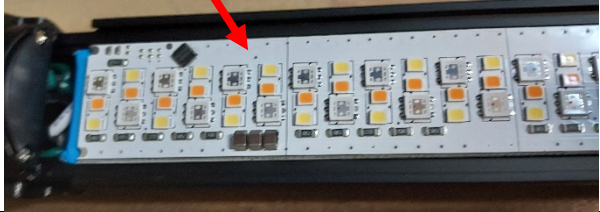
Claim 13	Accused Products
An LED lighting device configured for providing light suitable for a commercial image recording, the LED lighting device comprising:	The Accused Products are lighting devices suitable for commercial image recording. ULTRA LOW PROFILE WITH NEW PIXEL CONTROL Introducing the R2, the sequel to the original Rainbow Linear LED Light. This design adds a multitude of new features, while keeping the same sleek, sturdy low-profile shape as many of the legacy Quasar products you have grown to love. The R2 is offered in three lengths: the Q100R2 at 91 in/232 cm, Q50R2 at 47 in/120 cm and Q25R2 at 23 in/59 cm. All built with multi-pixel control without compromising the clean color or high output that we have always been known for. The Q25R2 offers 10 pixels, the Q50R2 has 24 pixels, and the Q100R2 allows for 48 separate pixels.
a. a support structure;	The Accused Products include a support structure (red arrow). 
b. a housing for the support structure;	The Accused Products include a housing that encloses the support structure.

**Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights**

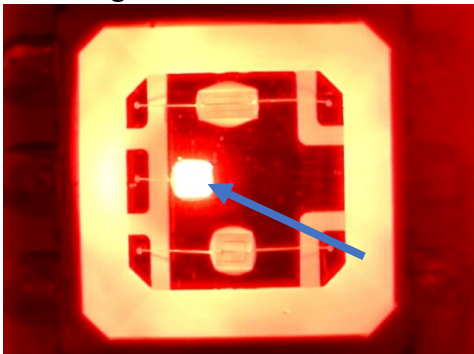
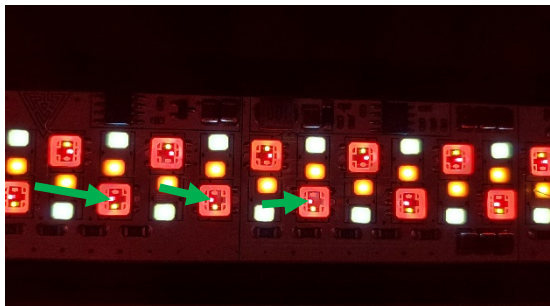
Claim 13	Accused Products																																																						
																																																							
c. an array of LED emitting devices mounted on the support structure,	The Accused Products include an array of LEDs mounted on the support structure. 																																																						
wherein the array of LED emitting devices is configured to emit four different colors of light and comprises:	The Accused Products include LED emitting devices that emit red, green, blue, bright white and warm white/amber. <table border="1" data-bbox="839 728 1433 924"><thead><tr><th colspan="6">Profile 14</th></tr><tr><th colspan="6">RGBTD 16 bit</th></tr><tr><th colspan="6">10 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th><th>Description</th><th>Default % / DMX</th></tr></thead><tbody><tr><td>1/2</td><td>Red</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>3/4</td><td>Green</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>5/6</td><td>Blue</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>7/8</td><td>2000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>9/10</td><td>6000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr></tbody></table> 	Profile 14						RGBTD 16 bit						10 DMX Channels per Pixel						Channel	Function	Value	Percentage	Description	Default % / DMX	1/2	Red	0-65,535	0-100		0	3/4	Green	0-65,535	0-100		0	5/6	Blue	0-65,535	0-100		0	7/8	2000k	0-65,535	0-100		0	9/10	6000k	0-65,535	0-100		0
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**Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights**

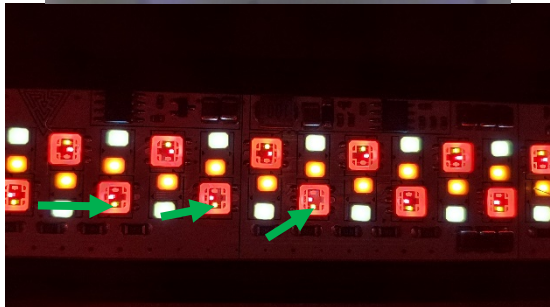
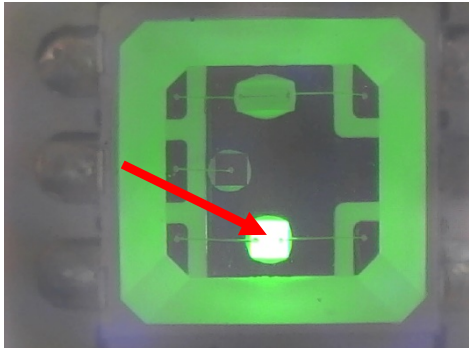
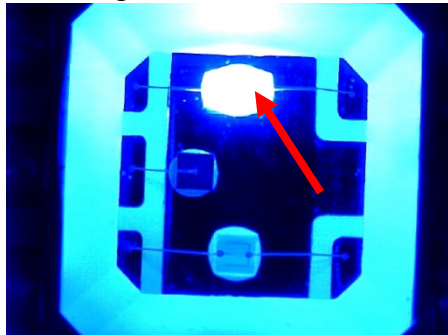
Claim 13	Accused Products																																																																																																												
a second set of LED emitting elements configured to emit light of a second color;	<table><tr><th colspan="6">Profile 14</th></tr><tr><th colspan="6">RGBTD 16 bit</th></tr><tr><th colspan="6">10 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th><th>Description</th><th>Default % / DMX</th></tr><tr><td>1/2</td><td>Red</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>3/4</td><td>Green</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>5/6</td><td>Blue</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>7/8</td><td>2000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>9/10</td><td>6000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr></table> The Accused Products have a second set of LEDs that emit green light.  <table><tr><th colspan="6">Profile 14</th></tr><tr><th colspan="6">RGBTD 16 bit</th></tr><tr><th colspan="6">10 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th><th>Description</th><th>Default % / DMX</th></tr><tr><td>1/2</td><td>Red</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>3/4</td><td>Green</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>5/6</td><td>Blue</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>7/8</td><td>2000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>9/10</td><td>6000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr></table>	Profile 14						RGBTD 16 bit						10 DMX Channels per Pixel						Channel	Function	Value	Percentage	Description	Default % / DMX	1/2	Red	0-65,535	0-100		0	3/4	Green	0-65,535	0-100		0	5/6	Blue	0-65,535	0-100		0	7/8	2000k	0-65,535	0-100		0	9/10	6000k	0-65,535	0-100		0	Profile 14						RGBTD 16 bit						10 DMX Channels per Pixel						Channel	Function	Value	Percentage	Description	Default % / DMX	1/2	Red	0-65,535	0-100		0	3/4	Green	0-65,535	0-100		0	5/6	Blue	0-65,535	0-100		0	7/8	2000k	0-65,535	0-100		0	9/10	6000k	0-65,535	0-100		0
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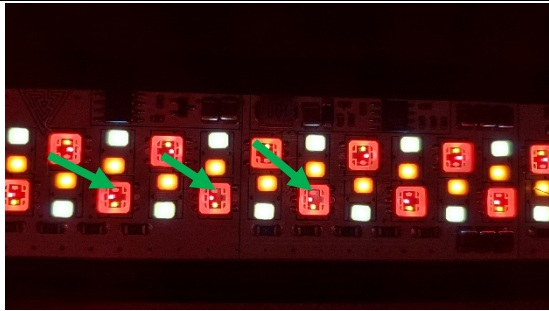
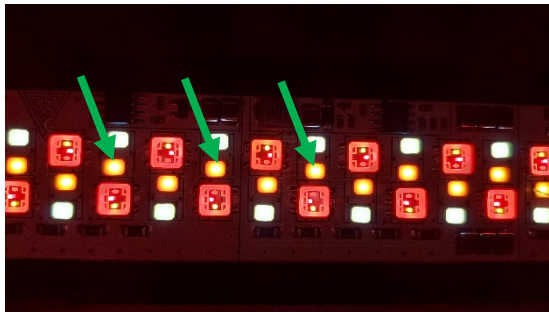
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d. a controller coupled to the array of LED emitting devices and	The Accused Products include a controller coupled to the LED array. 																																																						
configured to receive commands for operating select ones of the LED emitting devices with varying amounts of power to produce light consisting of varying amounts of the four different colors provided by the first, second,	The controller of the Accused Products is configured to receive commands.																																																						

Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights

Claim 13	Accused Products																		
third, and fourth sets of LED emitting elements to produce many different colors outputted from the lighting device, and	Button Shortcuts Min / Max Value Jump: On parameter menus such as Intensity, Color Temperature, Saturation, Hue, and Effects Parameters, While pressing and holding to increase the value, tapping will jump to the next value or max value. While pressing and holding to decrease the value, tapping will jump to the next value or minimum value. Enable/Disable Status Lights: Press and hold for 5 seconds to disable the status lights. Press again for 5 seconds to enable. Enable/Disable RDM: Press and hold for 2 seconds to disable RDM. Press again for 2 seconds to enable. Enable/Disable Wireless: Press and hold for 2 seconds to disable all Wireless Functions. Press again for 2 seconds to enable. Reset to Default: Press and hold for 3 seconds to reset the light to Default settings. Link Button: RX Mode - Press and hold to unpair the light. TX Mode - Tap to send pairing signal. Wireless Menu: Double press to open the Wireless Menu. Status Screen: Double press to return to the Status Screen. When on the Status Screen, Single press to display additional info. Control The controller of the Accused Products is configured to receive commands relating to the operating the five colors with varying intensities to produce many different colors from the Accused Products. Main Menu - Manual Mode <table border="0"> <tr> <td>> Intensity</td> <td>0 to 100% by 1%</td> </tr> <tr> <td>> Color Temp</td> <td>1,750K to 10,000K by 1 Just Notable Difference</td> </tr> <tr> <td>> +/- Green</td> <td>-G 100 to G 0 to +100 G -- Ex. +G 25 = 1/4 +Green, -G 50 = 1/2 -Green (Magenta).</td> </tr> <tr> <td>> Saturation</td> <td>0 to 100% by 1%</td> </tr> <tr> <td>> Hue</td> <td>0° to 360°</td> </tr> <tr> <td>> CT Preset</td> <td>3,200K - 4,300K - 5,600K - 6,500K(D65) - 7,500K(D75) - 10,000K - 2,000K - 2,500K - 3,000K</td> </tr> <tr> <td>> Color Preset</td> <td>Red - Orange - Yellow - Green - Cyan - Blue - Violet - Magenta</td> </tr> <tr> <td>> Effects</td> <td>Rainbow - Short Circuit - Paparazzi - Strobe - Fire - Emergency Lights - Demo* (See Page 17-18)</td> </tr> <tr> <td>> Config</td> <td>Light Settings (See Page 11)</td> </tr> </table> *Check the website for newly added effects The light produced by the Accused Products consists of light from the four sets of LEDs.	> Intensity	0 to 100% by 1%	> Color Temp	1,750K to 10,000K by 1 Just Notable Difference	> +/- Green	-G 100 to G 0 to +100 G -- Ex. +G 25 = 1/4 +Green, -G 50 = 1/2 -Green (Magenta).	> Saturation	0 to 100% by 1%	> Hue	0° to 360°	> CT Preset	3,200K - 4,300K - 5,600K - 6,500K(D65) - 7,500K(D75) - 10,000K - 2,000K - 2,500K - 3,000K	> Color Preset	Red - Orange - Yellow - Green - Cyan - Blue - Violet - Magenta	> Effects	Rainbow - Short Circuit - Paparazzi - Strobe - Fire - Emergency Lights - Demo* (See Page 17-18)	> Config	Light Settings (See Page 11)
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> Config	Light Settings (See Page 11)																		
further comprising an LED driver, the LED driver configured to selectively provide electrical power to the array of LED emitting devices,	The Accused Products include an LED that selectively provides power to the array of LEDs.																		
e. wherein the housing has a linear form factor substantially that of a fluorescent tube of one of a T12 and T8 form, and	The housing of the Accused Products has the shape of a fluorescent tube.																		

Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights

Claim 13	Accused Products
having a length of no greater than about four feet and a diameter of no greater than about 41 mm, and	 The diameter of the tube is approximately 1.5 inches. A T12 tube has a diameter of 1.5 inches.  1.5 inches is 38.1 mm. The Accused Products have lengths of two feet or four feet. 924-2301 RAINBOW 2 \$ 665.00 Length 2ft / 0.6m 4ft / 1.2m 8ft / 2.4m
further comprising an electrical input connection for receiving input power, and	The housings of the Accused Products include electrical connections for receiving power. UNIVERSAL AC & DC POWER INPUTS The R2 can be powered through either the universal AC power input for mains power anywhere or the auxiliary DC input for use with power bricks and battery packs.  AC IN Port  DC IN Port 3.5mm x 3.5mm 5V-5G Power
f. wherein the input connection is in electrical communication with the LED driver,	In order to provide power to the LEDs, the input connection is in electrical communication with the LED driver.
wherein the housing has opposite ends and	The housing has opposite ends (red arrows). 

Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights

Claim 13	Accused Products
the support surface is in a form of an elongated and narrow surface extending in the axial direction, and	The Accused Products have a support structure (red arrow) that is long with a narrow surface. 
the housing having a top side and a bottom side which each extend in the axial direction, and	The housing has a top side (red arrow) and a bottom side (green arrow). The top and bottom sides extend in an axial direction. 
wherein the LEDs are configured to emit light from the top side of the housing along a length of the housing between the opposite ends, and	In the Accused Products, the LEDs emit light from the top side of the housing between the opposite ends. 
the top side of the housing has a diffusion cover extending the axial length of the support between the ends.	The top side of the housing has a diffusion cover that extends between the ends. 
Claim 23	Accused Products
An LED lighting device configured for providing light suitable for a commercial image recording, the LED lighting device comprising:	The Accused Products are lighting devices suitable for commercial image recording. ULTRA LOW PROFILE WITH NEW PIXEL CONTROL Introducing the R2, the sequel to the original Rainbow Linear LED Light. This design adds a multitude of new features, while keeping the same sleek, sturdy low-profile shape as many of the legacy Quasar products you have grown to love. The R2 is offered in three lengths: the Q100R2 at 91 in/232 cm, Q50R2 at 47 in/120 cm and Q25R2 at 23 in/59 cm. All built with multi-pixel control without compromising the clean color or high output that we have always been known for. The Q25R2 offers 10 pixels, the Q50R2 has 24 pixels, and the Q100R2 allows for 48 separate pixels.
a support structure;	The Accused Products include a support structure (red arrow).

Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights

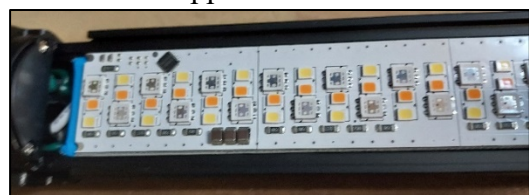
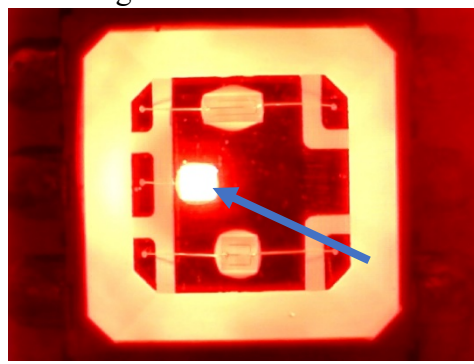
Claim 23	Accused Products																																																						
																																																							
a housing for the support structure;	The Accused Products include a housing that encloses the support structure. 																																																						
an array of LED emitting devices mounted on the support structure,	The Accused Products include an array of LEDs mounted on the support structure. 																																																						
wherein the array of LED emitting devices is configured to emit five different colors of light and comprises:	The Accused Products include LED emitting devices that emit red, green, blue, bright white and amber warm white. <table border="1" data-bbox="839 1037 1430 1236"><thead><tr><th colspan="6">Profile 14</th></tr><tr><th colspan="6">RGBTD 16 bit</th></tr><tr><th colspan="6">10 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th><th>Description</th><th>Default % / DMX</th></tr></thead><tbody><tr><td>1/2</td><td>Red</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>3/4</td><td>Green</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>5/6</td><td>Blue</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>7/8</td><td>2000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>9/10</td><td>6000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr></tbody></table> 	Profile 14						RGBTD 16 bit						10 DMX Channels per Pixel						Channel	Function	Value	Percentage	Description	Default % / DMX	1/2	Red	0-65,535	0-100		0	3/4	Green	0-65,535	0-100		0	5/6	Blue	0-65,535	0-100		0	7/8	2000k	0-65,535	0-100		0	9/10	6000k	0-65,535	0-100		0
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a first set of LED emitting elements configured to emit light of a first color;	The Accused Products have a first set of LEDs that emit red light. 																																																						

**Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights**

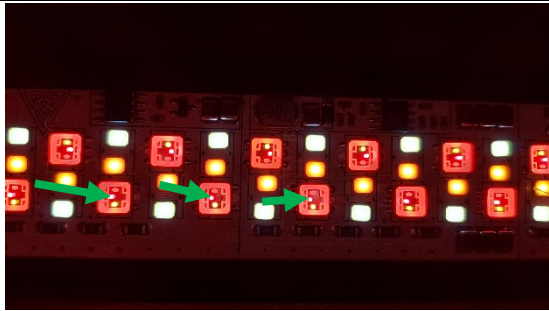
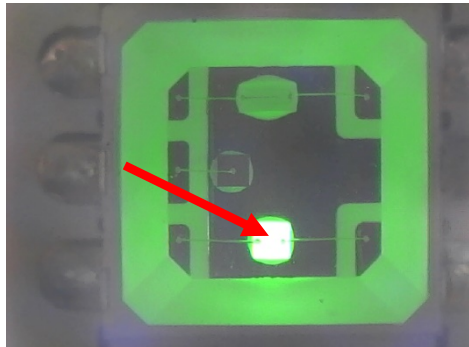
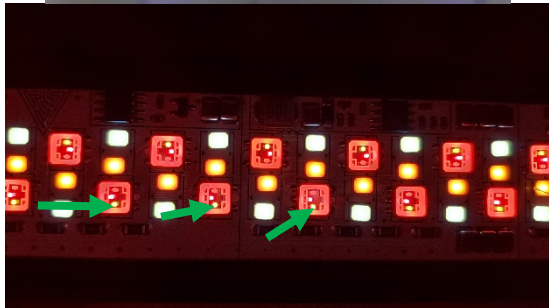
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a second set of LED emitting elements configured to emit light of a second color;	The Accused Products have a second set of LEDs that emit green light.   <table><tr><th colspan="6">Profile 14</th></tr><tr><th colspan="6">RGBTD 16 bit</th></tr><tr><th colspan="6">10 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th><th>Description</th><th>Default % / DMX</th></tr><tr><td>1/2</td><td>Red</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>3/4</td><td>Green</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>5/6</td><td>Blue</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>7/8</td><td>2000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>9/10</td><td>6000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr></table>	Profile 14						RGBTD 16 bit						10 DMX Channels per Pixel						Channel	Function	Value	Percentage	Description	Default % / DMX	1/2	Red	0-65,535	0-100		0	3/4	Green	0-65,535	0-100		0	5/6	Blue	0-65,535	0-100		0	7/8	2000k	0-65,535	0-100		0	9/10	6000k	0-65,535	0-100		0
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a third set of LED emitting elements configured to emit light of a third color;	The Accused Products have a third set of LEDs that emit blue light.																																																						

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U.S. Patent No. 10,197,224 by Rainbow 2 Lights

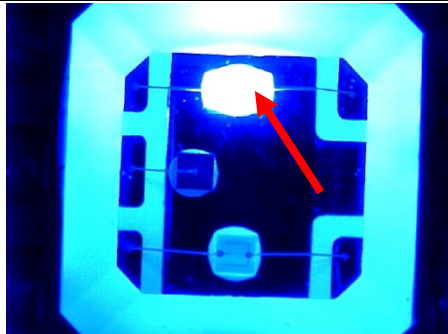
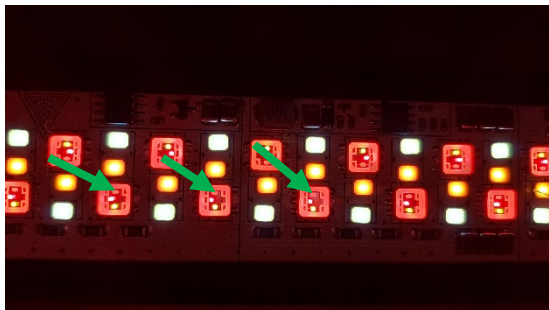
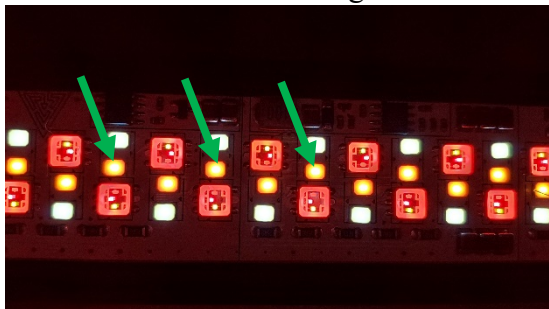
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a fourth set of LED emitting elements configured to emit light of at a fourth color; and	The Accused Products have a fourth set of LEDs that emit amber warm white light.  <table><tr><th colspan="6">Profile 14</th></tr><tr><th colspan="6">RGBTD 16 bit</th></tr><tr><th colspan="6">10 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th><th>Description</th><th>Default % / DMX</th></tr><tr><td>1/2</td><td>Red</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>3/4</td><td>Green</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>5/6</td><td>Blue</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>7/8</td><td>2000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>9/10</td><td>6000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr></table>	Profile 14						RGBTD 16 bit						10 DMX Channels per Pixel						Channel	Function	Value	Percentage	Description	Default % / DMX	1/2	Red	0-65,535	0-100		0	3/4	Green	0-65,535	0-100		0	5/6	Blue	0-65,535	0-100		0	7/8	2000k	0-65,535	0-100		0	9/10	6000k	0-65,535	0-100		0
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a fifth set of LED emitting elements configured to emit a broad-spectrum white light within a predetermined Kelvin temperature range; and	The Accused Products have a fifth set of LEDs that emit broad-spectrum bright white light.																																																						

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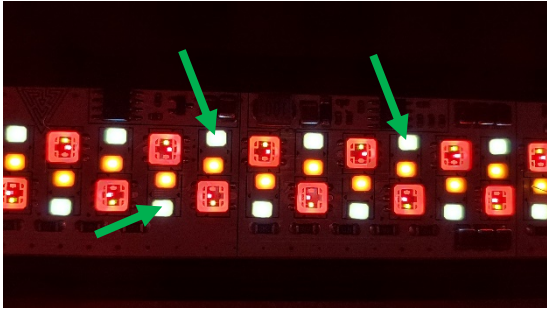
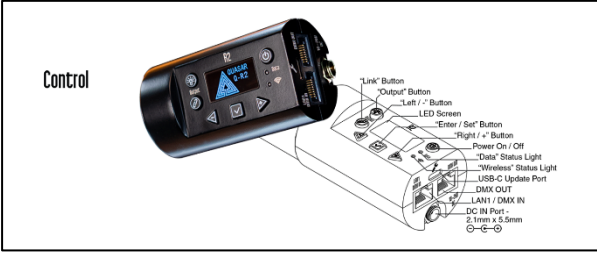
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Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights

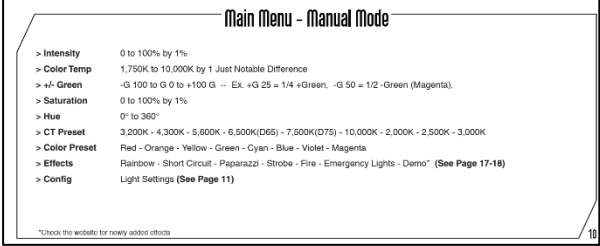
Claim 23	Accused Products
	 The light produced by the Accused Products consists of light from the five sets of LEDs.
an LED driver configured to selectively provide electrical power to the array of LED emitting devices;	The Accused Products include an LED that selectively provides power to the array of LEDs. 
wherein the housing has a linear form factor substantially that of one of a T12 and T8 form, and fluorescent tube light, and	The housing of the Accused Products has the shape of a fluorescent tube.  The diameter of the tube is approximately 1.5 inches. A T12 tube has a diameter of 1.5 inches.  1.5 inches is 38.1 mm.

**Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights**

Claim 23	Accused Products
further comprising an electrical input connection for receiving input power, wherein the input connection is in electrical communication with the LED driver, and	The housings of the Accused Products include electrical connections for receiving power.  In order to provide power to the LEDs, the input connection is in electrical communication with the LED driver.
wherein the housing has opposite ends and	The housing has opposite ends (red arrows). 
the support structure is in a form of an elongated and narrow surface extending in the axial direction and	The Accused Products have a support structure (red arrow) that is long with a narrow surface. 
the housing having a top side and a bottom side which each extend in the axial direction, and	The housing has a top side (red arrow) and a bottom side (green arrow). The top and bottom sides extend in an axial direction. 
wherein the LEDs are configured to emit light from the top side of the housing along a length of the housing between the opposite ends, and	In the Accused Products, the LEDs emit light from the top side of the housing between the opposite ends. 
the top side of the housing has a diffusion cover extending the axial length of the support between the ends.	The top side of the housing has a diffusion cover that extends between the ends. 
Claim 25	Accused Products
The LED lighting device of claim 23, wherein the LED driver is adapted for selectively	In the Accused Products, the LEDs are adapted to be driven in increments of about 1/255.

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Claim 25	Accused Products																																				
driving each of the first set, second set, third set, fourth and fifth set of LED emitting elements in increments of about 1/255 to selectively produce at least 255 different colors from the lighting device.	<table><tr><th colspan="4">Profile 13</th></tr><tr><th colspan="4">RGBTD 8 bit</th></tr><tr><th colspan="4">5 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th></tr><tr><td>1</td><td>Red</td><td>0-255</td><td>0-100</td></tr><tr><td>2</td><td>Green</td><td>0-255</td><td>0-100</td></tr><tr><td>3</td><td>Blue</td><td>0-255</td><td>0-100</td></tr><tr><td>4</td><td>2000k</td><td>0-255</td><td>0-100</td></tr><tr><td>5</td><td>6000k</td><td>0-255</td><td>0-100</td></tr></table>	Profile 13				RGBTD 8 bit				5 DMX Channels per Pixel				Channel	Function	Value	Percentage	1	Red	0-255	0-100	2	Green	0-255	0-100	3	Blue	0-255	0-100	4	2000k	0-255	0-100	5	6000k	0-255	0-100
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Claim 26	Accused Products																																				
The LED lighting device of claim [2]5, wherein the LED driver is adapted for selectively driving each of the first set, second set, third set, fourth set and fifth set of LED emitting elements in response to DMX signals from an external computer console or lighting control board to selectively produce the at least 255 different colors of an entertainment industry color wheel emitted from the lighting device.	In the Accused Products, the LEDs are adapted to be driven in increments of about 1/255 based on DMX signals from a remote computer. <table><tr><th colspan="4">Profile 13</th></tr><tr><th colspan="4">RGBTD 8 bit</th></tr><tr><th colspan="4">5 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th></tr><tr><td>1</td><td>Red</td><td>0-255</td><td>0-100</td></tr><tr><td>2</td><td>Green</td><td>0-255</td><td>0-100</td></tr><tr><td>3</td><td>Blue</td><td>0-255</td><td>0-100</td></tr><tr><td>4</td><td>2000k</td><td>0-255</td><td>0-100</td></tr><tr><td>5</td><td>6000k</td><td>0-255</td><td>0-100</td></tr></table> Status Lights Wired  Data  DMX Mode / Data Received Data: Red / Wireless: Off  Data  Ethernet Mode / Data Received Data: Yellow / Wireless: Off Wireless  Data  Wireless DMX Data: Red / Wireless: Green (Or Universe Color)  Data  WiFi Mode (Art-Net over WiFi) Data: Yellow / Wireless: Magenta  Data  WiFi Access Point Mode (Art-Net over WiFi) Data: Yellow / Wireless: Orange  Data  Bluetooth Mode Data: Blue / Wireless: Blue	Profile 13				RGBTD 8 bit				5 DMX Channels per Pixel				Channel	Function	Value	Percentage	1	Red	0-255	0-100	2	Green	0-255	0-100	3	Blue	0-255	0-100	4	2000k	0-255	0-100	5	6000k	0-255	0-100
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Claim 28	Accused Products
The LED lighting device of claim 23, wherein the electrical input connection is configured to receive AC input power.	The Accused Product include an electrical connection configured to receive either AC or DC input power. UNIVERSAL AC & DC POWER INPUTS The R2 can be powered through either the universal AC power input for mains power anywhere or the auxiliary DC input for use with power bricks and battery packs.  

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Claim 29	Accused Products
The LED lighting device of claim 23, wherein the fluorescent tube light has a substantially T12 form.	A T12 tube has a diameter of 1.5 inches (38.1mm). The housing of the Accused Products has the shape of a fluorescent tube.  The diameter of the tube is approximate 1.5 inches. 
Claim 30	Accused Products
The LED lighting device of claim 23, wherein the fluorescent tube light has a substantially T12 form and is about one to four feet long.	A T12 tube has a diameter of 1.5 inches (38.1mm). The housing of the Accused Products has the shape of a fluorescent tube.  The diameter of the tube is approximate 1.5 inches.

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Claim 30	Accused Products
	 The Accused Products have lengths of two feet or four feet. 924-2301 RAINBOW 2 \$ 665.00 Length 2ft / 0.6m 4ft / 1.2m 8ft / 2.4m

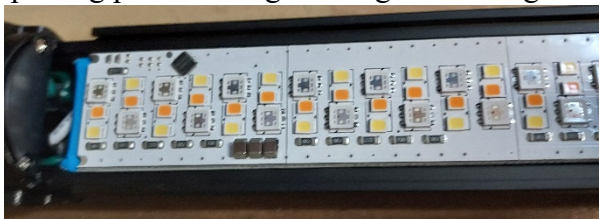
Claim 31	Accused Products																																				
The LED lighting device of claim 23, wherein at least one of the colors of the LEDs is amber.	The Accused Products have a 2000K LED that produce an amber color of warm white light. <table><tr><th colspan="4">Profile 13</th></tr><tr><th colspan="4">RGBTD 8 bit</th></tr><tr><th colspan="4">5 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th></tr><tr><td>1</td><td>Red</td><td>0-255</td><td>0-100</td></tr><tr><td>2</td><td>Green</td><td>0-255</td><td>0-100</td></tr><tr><td>3</td><td>Blue</td><td>0-255</td><td>0-100</td></tr><tr><td>4</td><td>2000k</td><td>0-255</td><td>0-100</td></tr><tr><td>5</td><td>6000k</td><td>0-255</td><td>0-100</td></tr></table>	Profile 13				RGBTD 8 bit				5 DMX Channels per Pixel				Channel	Function	Value	Percentage	1	Red	0-255	0-100	2	Green	0-255	0-100	3	Blue	0-255	0-100	4	2000k	0-255	0-100	5	6000k	0-255	0-100
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Claim 32	Accused Products
The LED lighting device of claim 23, wherein the first, second, third and fourth LEDs are red, green, blue and amber, respectively.	The Accused Products have a red, green, blue, and 2000K (amber warm white) LEDs.

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Claim 33	Accused Products																																				
The LED lighting device of claim 23, wherein among the colors the driver is configured to selectively produce are white light in each of daylight and tungsten temperature ranges.	The Accused Products are configured to produce white light in the daylight and tungsten temperature ranges. <table><tr><th colspan="4">Profile 13</th></tr><tr><th colspan="4">RGBTD 8 bit</th></tr><tr><th colspan="4">5 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th></tr><tr><td>1</td><td>Red</td><td>0-255</td><td>0-100</td></tr><tr><td>2</td><td>Green</td><td>0-255</td><td>0-100</td></tr><tr><td>3</td><td>Blue</td><td>0-255</td><td>0-100</td></tr><tr><td>4</td><td>2000k</td><td>0-255</td><td>0-100</td></tr><tr><td>5</td><td>6000k</td><td>0-255</td><td>0-100</td></tr></table>	Profile 13				RGBTD 8 bit				5 DMX Channels per Pixel				Channel	Function	Value	Percentage	1	Red	0-255	0-100	2	Green	0-255	0-100	3	Blue	0-255	0-100	4	2000k	0-255	0-100	5	6000k	0-255	0-100
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Claim 34	Accused Products
The LED lighting device of claim 23, wherein the first, second, third, fourth and fifth LEDs are arranged substantially in a repeating matrix pattern along the length of the axial direction.	In the Accused Products the first, second, third fourth and fifth LEDs are arranged in a repeating pattern along the length of the light. 

Claim 35	Accused Products
An LED lighting device configured for providing light suitable for a commercial image recording, the LED lighting device comprising:	The Accused Products are lighting devices suitable for commercial image recording.

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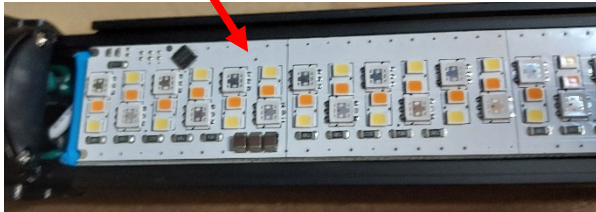
Claim 35	Accused Products																																																						
	ULTRA LOW PROFILE WITH NEW PIXEL CONTROL Introducing the R2, the sequel to the original Rainbow Linear LED Light. This design adds a multitude of new features, while keeping the same sleek, sturdy low-profile shape as many of the legacy Quasar products you have grown to love. The R2 is offered in three lengths: the Q100R2 at 91 in/232 cm, Q50R2 at 47 in/120 cm and Q25R2 at 23 in/59 cm. All built with multi-pixel control without compromising the clean color or high output that we have always been known for. The Q25R2 offers 10 pixels, the Q50R2 has 24 pixels, and the Q100R2 allows for 48 separate pixels.																																																						
a. a support structure;	The Accused Products include a support structure (red arrow). 																																																						
b. a housing for the support structure;	The Accused Products include a housing that encloses the support structure. 																																																						
c. an array of LED emitting devices mounted on the support structure,	The Accused Products include an array of LEDs mounted on the support structure. 																																																						
wherein the array of LED emitting devices is configured to emit four different colors of light and comprises:	The Accused Products include LED emitting devices that emit red, green, blue, bright white and warm white/amber. <table><tr><th colspan="6">Profile 14</th></tr><tr><th colspan="6">RGBTD 16 bit</th></tr><tr><th colspan="6">10 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th><th>Description</th><th>Default % / DMX</th></tr><tr><td>1/2</td><td>Red</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>3/4</td><td>Green</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>5/6</td><td>Blue</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>7/8</td><td>2000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>9/10</td><td>6000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr></table> 	Profile 14						RGBTD 16 bit						10 DMX Channels per Pixel						Channel	Function	Value	Percentage	Description	Default % / DMX	1/2	Red	0-65,535	0-100		0	3/4	Green	0-65,535	0-100		0	5/6	Blue	0-65,535	0-100		0	7/8	2000k	0-65,535	0-100		0	9/10	6000k	0-65,535	0-100		0
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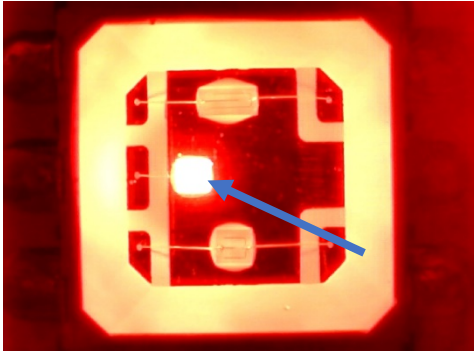
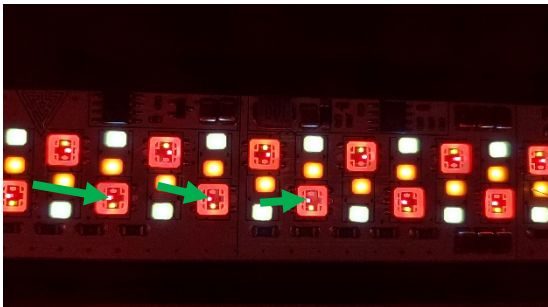
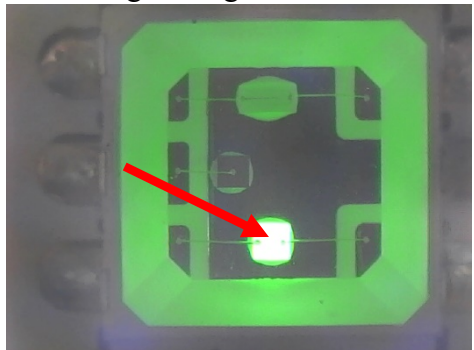
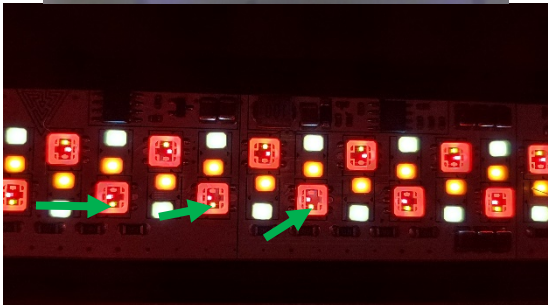
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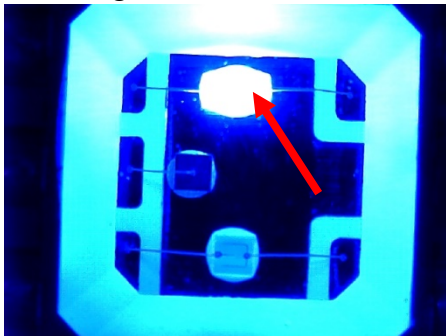
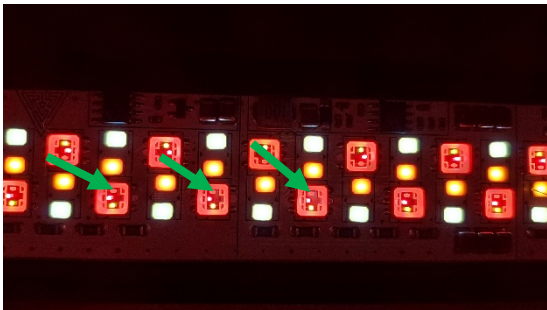
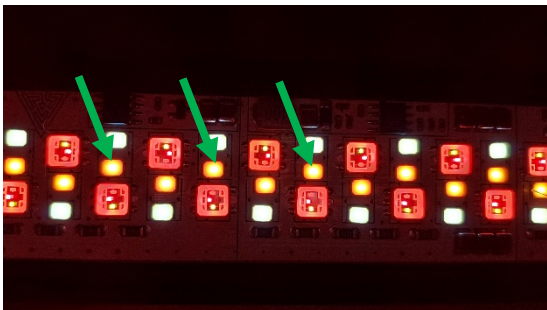
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a third set of LED emitting elements configured to emit light of a third color; and	Profile 14 RGBTD 16 bit 10 DMX Channels per Pixel <table><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th><th>Description</th><th>Default % / DMX</th></tr><tr><td>1/2</td><td>Red</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>3/4</td><td>Green</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>5/6</td><td>Blue</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>7/8</td><td>2000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>9/10</td><td>6000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr></table> The Accused Products have a third set of LEDs that emit blue light.   Profile 14 RGBTD 16 bit 10 DMX Channels per Pixel <table><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th><th>Description</th><th>Default % / DMX</th></tr><tr><td>1/2</td><td>Red</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>3/4</td><td>Green</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>5/6</td><td>Blue</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>7/8</td><td>2000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>9/10</td><td>6000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr></table>	Channel	Function	Value	Percentage	Description	Default % / DMX	1/2	Red	0-65,535	0-100		0	3/4	Green	0-65,535	0-100		0	5/6	Blue	0-65,535	0-100		0	7/8	2000k	0-65,535	0-100		0	9/10	6000k	0-65,535	0-100		0	Channel	Function	Value	Percentage	Description	Default % / DMX	1/2	Red	0-65,535	0-100		0	3/4	Green	0-65,535	0-100		0	5/6	Blue	0-65,535	0-100		0	7/8	2000k	0-65,535	0-100		0	9/10	6000k	0-65,535	0-100		0
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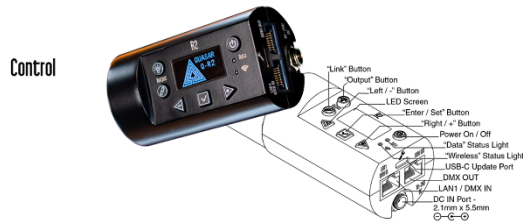
Claim 35	Accused Products																																																						
	<table><tr><th colspan="6">Profile 14</th></tr><tr><th colspan="6">RGBTD 16 bit</th></tr><tr><th colspan="6">10 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th><th>Description</th><th>Default % / DMX</th></tr><tr><td>1/2</td><td>Red</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>3/4</td><td>Green</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>5/6</td><td>Blue</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>7/8</td><td>2000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr><tr><td>9/10</td><td>6000k</td><td>0-65,535</td><td>0-100</td><td></td><td>0</td></tr></table>	Profile 14						RGBTD 16 bit						10 DMX Channels per Pixel						Channel	Function	Value	Percentage	Description	Default % / DMX	1/2	Red	0-65,535	0-100		0	3/4	Green	0-65,535	0-100		0	5/6	Blue	0-65,535	0-100		0	7/8	2000k	0-65,535	0-100		0	9/10	6000k	0-65,535	0-100		0
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d. a controller coupled to the array of LED emitting devices and	The Accused Products include a controller coupled to the LED array. 																																																						
configured to receive commands for operating select ones of the LED emitting devices with varying amounts of power to produce light consisting of varying amounts of the five different colors provided by the first, second, third, and fourth sets of LED emitting elements to produce many different colors outputted from the lighting device which are uniform in color, and	The controller of the Accused Products is configured to receive commands. Button Shortcuts Min / Max Value Jump: On parameter menus such as Intensity, Color Temperature, Saturation, Hue, and Effects Parameters, While pressing and holding to increase the value, tapping will jump to the next value or max value. While pressing and holding to decrease the value, tapping will jump to the next value or minimum value. Enable/Disable Status Lights: Press and hold for 5 seconds to disable the status lights. Press again for 5 seconds to enable. Enable/Disable RDM: Press and hold for 2 seconds to disable RDM. Press again for 2 seconds to enable. Enable/Disable Wireless: Press and hold for 2 seconds to disable all Wireless Functions. Press again for 2 seconds to enable. Reset to Default: Press and hold for 3 seconds to reset the light to Default settings. Link Button: RX Mode - Press and hold to unpair the light. TX Mode - Tap to send pairing signal. Wireless Menu: Double press to open the Wireless Menu. Status Screen: Double press to return to the Status Screen. When on the Status Screen, Single press to display additional info. Control 																																																						
	The controller of the Accused Products is configured to receive commands relating to the operating the five colors with varying intensities to produce many different colors from the Accused Products. Main Menu - Manual Mode > Intensity 0 to 100% by 1% > Color Temp 1,750K to 10,000K by 1 Just Notable Difference > +/- Green -G 100 to G 0 to +100 G -- Ex: +G 25 = 1/4 +Green, -G 50 = 1/2 -Green (Magenta). > Saturation 0 to 100% by 1% > Hue 0° to 360° > CT Preset 3,200K - 4,300K - 5,600K - 6,500K(D65) - 7,500K(D75) - 10,000K - 2,000K - 2,500K - 3,000K > Color Preset Red - Orange - Yellow - Green - Cyan - Blue - Violet - Magenta > Effects Rainbow - Short Circuit - Paparazzi - Strobe - Fire - Emergency Lights - Demo* (See Page 17-18) > Config Light Settings (See Page 11) *Check this website for newly added effects																																																						

Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights

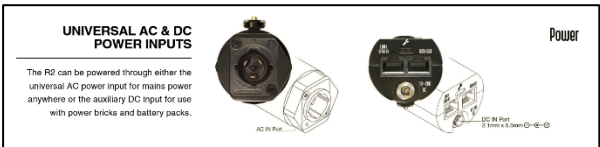
Claim 35	Accused Products
an LED driver configured to selectively provide electrical power to the array of LED emitting devices,	The Accused Products include an LED that selectively provides power to the array of LEDs. 
e. wherein the housing has a linear form factor substantially that of a fluorescent tube light of one of a T12 and T8 form, and	The housing of the Accused Products has the shape of a T12 fluorescent tube.  The diameter of the tube is approximately 1.5 inches. A T12 tube has a diameter of 1.5 inches. 
further comprising an electrical input connection for receiving input power,	The housings of the Accused Products include electrical connections for receiving power. 
wherein the input connection is in electrical communication with the LED driver, and	In order to provide power to the LEDs, the input connection is in electrical communication with the LED driver.
f. wherein the housing has opposite ends and	The housing has opposite ends (red arrows). 
the support structure is in a form of an elongated and narrow surface extending in the axial direction and	The Accused Products have a support structure (red arrow) that is long with a narrow surface.

**Exhibit 12 – Patent Infringing Claim Chart for Claims of
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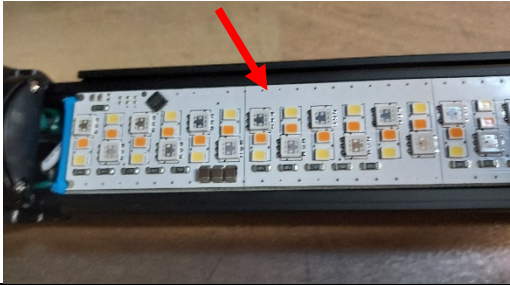
Claim 35	Accused Products
	
the housing having a top side and a bottom side which each extend in the axial direction, and	The housing has a top side (red arrow) and a bottom side (green arrow). The top and bottom sides extend in an axial direction. 
wherein the LEDs are configured to emit light from the top side of the housing along a length of the housing between the opposite ends, and	In the Accused Products, the LEDs emit light from the top side of the housing between the opposite ends. 
the top side of the housing has a diffusion cover extending the axial length of the support between the ends.	The top side of the housing has a diffusion cover that extends between the ends. 
Claim 36	Accused Products
The LED lighting device of claim 35, wherein the first, second, third and fourth sets of LED light emitting elements are evenly dispersed along the length of the lighting device.	In the Accused Products the LEDs are evenly dispersed along the length of the support structure. 
Claim 37	Accused Products
The LED lighting device of claim 35, wherein the LED driver is adapted for selectively driving each of the first set, second set, third set and fourth set of LED emitting elements in increments of about 1/255 to selectively	In the Accused Products, the LEDs are adapted to be driven in increments of about 1/255.

Exhibit 12 – Patent Infringing Claim Chart for Claims of
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Claim 37	Accused Products																																				
produce at least 255 different colors from the lighting device.	<table><tr><th colspan="4">Profile 13</th></tr><tr><th colspan="4">RGBTD 8 bit</th></tr><tr><th colspan="4">5 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th></tr><tr><td>1</td><td>Red</td><td>0-255</td><td>0-100</td></tr><tr><td>2</td><td>Green</td><td>0-255</td><td>0-100</td></tr><tr><td>3</td><td>Blue</td><td>0-255</td><td>0-100</td></tr><tr><td>4</td><td>2000k</td><td>0-255</td><td>0-100</td></tr><tr><td>5</td><td>6000k</td><td>0-255</td><td>0-100</td></tr></table>	Profile 13				RGBTD 8 bit				5 DMX Channels per Pixel				Channel	Function	Value	Percentage	1	Red	0-255	0-100	2	Green	0-255	0-100	3	Blue	0-255	0-100	4	2000k	0-255	0-100	5	6000k	0-255	0-100
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Claim 38	Accused Products																																				
The LED lighting device of claim 37, wherein the LED driver is adapted for selectively driving each of the first set, second set, third set, fourth set and fifth set of LED emitting elements in response to DMX signals from an external computer console or lighting control board to selectively produce the at least 255 different colors of an entertainment industry color wheel emitted from the lighting device.	In the Accused Products, the LEDs are adapted to be driven in increments of about 1/255 based on DMX signals from a remote computer. <table><tr><th colspan="4">Profile 13</th></tr><tr><th colspan="4">RGBTD 8 bit</th></tr><tr><th colspan="4">5 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th></tr><tr><td>1</td><td>Red</td><td>0-255</td><td>0-100</td></tr><tr><td>2</td><td>Green</td><td>0-255</td><td>0-100</td></tr><tr><td>3</td><td>Blue</td><td>0-255</td><td>0-100</td></tr><tr><td>4</td><td>2000k</td><td>0-255</td><td>0-100</td></tr><tr><td>5</td><td>6000k</td><td>0-255</td><td>0-100</td></tr></table> Status Lights Wired DMX Mode / Data Received Data: Red / Wireless: Off Ethernet Mode / Data Received Data: Yellow / Wireless: Off Wireless Wireless DMX Data: Red / Wireless: Green (Or Universe Color) WiFi Mode (Art-Net over WiFi) Data: Yellow / Wireless: Magenta WiFi Access Point Mode (Art-Net over WiFi) Data: Yellow / Wireless: Orange Bluetooth Mode Data: Blue / Wireless: Blue	Profile 13				RGBTD 8 bit				5 DMX Channels per Pixel				Channel	Function	Value	Percentage	1	Red	0-255	0-100	2	Green	0-255	0-100	3	Blue	0-255	0-100	4	2000k	0-255	0-100	5	6000k	0-255	0-100
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Claim 39	Accused Products																																				
The LED lighting device of claim 35, wherein the LED driver is adapted for selectively driving each of the first set, second set, third set and fourth set of LED emitting elements to selectively produce at least 255 different colors of a color wheel from the lighting device.	In the Accused Products, the LEDs are adapted to be driven in increments of about 1/255.																																				
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Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights

Claim 41	Accused Products
The LED lighting device of claim 35, wherein the fluorescent tube light has a substantially T12 form.	A T12 tube has a diameter of 1.5 inches (38.1mm). The housing of the Accused Products has the shape of a fluorescent tube.  The diameter of the tube is approximate 1.5 inches.  1.5 inches is 38.1 mm.
Claim 42	Accused Products
The LED lighting device of claim 35, wherein the fluorescent tube light has a substantially T12 form and is about one to four feet long.	A T12 tube has a diameter of 1.5 inches (38.1mm). The housing of the Accused Products has the shape of a fluorescent tube.  The diameter of the tube is approximate 1.5 inches.

Exhibit 12 – Patent Infringing Claim Chart for Claims of
U.S. Patent No. 10,197,224 by Rainbow 2 Lights

Claim 42	Accused Products
	 1.5 inches is 38.1 mm. The Accused Products have lengths of two feet or four feet. 924-2301 RAINBOW 2 \$ 665.00 Length 2ft / 0.6m 4ft / 1.2m 8ft / 2.4m

Claim 43	Accused Products																																				
The LED lighting device of claim 35, wherein at least one of the colors of the LEDs is amber.	The Accused Products have a 2000K LED that produces an amber color of warm white light. <table><tr><th colspan="4">Profile 13</th></tr><tr><th colspan="4">RGBTD 8 bit</th></tr><tr><th colspan="4">5 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th></tr><tr><td>1</td><td>Red</td><td>0-255</td><td>0-100</td></tr><tr><td>2</td><td>Green</td><td>0-255</td><td>0-100</td></tr><tr><td>3</td><td>Blue</td><td>0-255</td><td>0-100</td></tr><tr><td>4</td><td>2000k</td><td>0-255</td><td>0-100</td></tr><tr><td>5</td><td>6000k</td><td>0-255</td><td>0-100</td></tr></table>	Profile 13				RGBTD 8 bit				5 DMX Channels per Pixel				Channel	Function	Value	Percentage	1	Red	0-255	0-100	2	Green	0-255	0-100	3	Blue	0-255	0-100	4	2000k	0-255	0-100	5	6000k	0-255	0-100
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U.S. Patent No. 10,197,224 by Rainbow 2 Lights

Claim 44	Accused Products																																				
The LED lighting device of claim 35, wherein among the colors the driver is configured to selectively produce are white light in each of daylight and tungsten temperature ranges.	The Accused Products are configured to produce white light in the daylight and tungsten temperature ranges. <table><tr><th colspan="4">Profile 13</th></tr><tr><th colspan="4">RGBTD 8 bit</th></tr><tr><th colspan="4">5 DMX Channels per Pixel</th></tr><tr><th>Channel</th><th>Function</th><th>Value</th><th>Percentage</th></tr><tr><td>1</td><td>Red</td><td>0-255</td><td>0-100</td></tr><tr><td>2</td><td>Green</td><td>0-255</td><td>0-100</td></tr><tr><td>3</td><td>Blue</td><td>0-255</td><td>0-100</td></tr><tr><td>4</td><td>2000k</td><td>0-255</td><td>0-100</td></tr><tr><td>5</td><td>6000k</td><td>0-255</td><td>0-100</td></tr></table>	Profile 13				RGBTD 8 bit				5 DMX Channels per Pixel				Channel	Function	Value	Percentage	1	Red	0-255	0-100	2	Green	0-255	0-100	3	Blue	0-255	0-100	4	2000k	0-255	0-100	5	6000k	0-255	0-100
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Claim 45	Accused Products
The LED lighting device of claim 35, wherein the first, second, third, and fourth LEDs are arranged substantially in a repeating matrix pattern along the length of the axial direction.	In the Accused Products the first, second, third and fourth LEDs are arranged in a repeating pattern along the length of the light. 