

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUASAR SCIENCE LLC
Petitioner,

v.

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

Case: IPR2023-00614
U.S. Patent No. 10,566,895

**DECLARATION OF BRUCE WONDERLICK IN
SUPPORT OF PATENT OWNER'S RESPONSE**

DECLARATION OF BRUCE WONDERLICK IN SUPPORT OF PATENT OWNER'S RESPONSE

I, Bruce Wonderlick, declare as follows:

1. I have worked in the entertainment industry with Paramount since about May 1995. I am currently set lighting rental manager at Paramount Pictures (“Paramount”) and have been in that position from 1999 to the present.
2. I oversee stocking, ordering and providing set lighting equipment for all productions for which Paramount provides lighting equipment (on the Paramount lot and elsewhere).
3. Paramount has been in business for over 100 years. Recent examples of well-known TV series filmed at Paramount include The Rookie, NCIS LA, and This Is Us. A recent movie filmed at Paramount is Mean Girls (the musical) to be released in 2024.
4. Paramount is one of “The Big Five” major studios. It has 27 stages. Attached as Appendix A is a map for our studios at 5555 Melrose Avenue in Hollywood, California. Paramount also has outdoor backdrops such as its New York lot, blue sky lot and an alley. A copy of the New York backlot map is attached as Appendix B.
5. I am familiar with Guillermo Macias (“Memo”) of Colt LED and the bicolor lighting device of the type shown in his U.S. Patent Numbers 10,411,582 and

10,566,895 (“Colt’s Patents”). I refer to the invention in these two patents as “Memo’s Bicolor LED Tube Invention” and I refer to Colt’s bicolor LED tube light product itself as “Colt’s Bicolor LED Tube.”

6. I understand Colt’s Bicolor LED Tube has the features disclosed and claimed in Colt’s Patents.
7. Generally, Colt’s Bicolor Tube light is in the shape of a fluorescent tube, has LEDs over 90 CRI, produces tungsten and daylight temperature light using a switch to select one of these two types of light, has sufficient brightness to be used as key light (primary light on set), emits an evenly distributed light from its cover and produces white light which does not require color compensation gels due to its low level of green and magenta tones. Accordingly, Colt’s Bicolor Tube light is always or almost always used for filming without the need for using any gels for it, although gels, films, or wraps may sometimes be used for specific effects.
8. Prior to Memo’s Bicolor LED Tube Invention, existing LED lights in the entertainment industry were of limited use because they generally contained too much green light and lacked sufficient brightness. Also, there were no bicolor LED tubular lights, i.e., no bicolor lights in the form factors of fluorescent tubes known or available in the industry. The industry standard in 2013 and for about 25 to 30 years prior to that time had been fluorescent tube lights.

9. Within the set lighting industry, color reproduction accuracy, primarily the avoidance of too much green and too much magenta tones in the light is critical. Rigging time is also a very important consideration, and so by meeting the necessary color reproduction accuracy while avoiding the use of gels to compensate for too much green and/or magenta Colt's Bicolor LED Tube, providing 90+ CRI and being switchable between daylight and tungsten white output provides substantial benefits.
10. Prior to the introduction of Colt's Bicolor Tube light (late 2012-2013), of the approximately 20 new productions per year that Paramount supplies lighting equipment for, the industry standard one-color fluorescent tubes were used about 90 percent of the time.
11. At the time of introduction of Colt's Bicolor Tube light, LED lights that I had seen and heard of often had too much green tone (requiring gel correction) when producing warm white light (tungsten) and too much magenta tone (requiring gel correction) when producing cool white light (daylight).
12. Colt's Bicolor LED Tube was and is a very cost effective and desirable alternative to fluorescent tubes for several reasons:
 - a) It has sufficient brightness for use in the set lighting industry yet emits an even light (not point sources);

- b) It has sufficiently high-quality white light (low green/magenta) regardless of the selected color temperature (warm or cool) as no gel correction is required;
- c) It has sufficiently high quality of light (high CRI);
- d) It changes color temperature from warm to cool and cool to warm by a switch rather than changing out lights or using gels so it is easy and fast to rig; and
- e) Its fluorescent tube form factor allows it to be placed in a manner familiar to gaffers.

- 13. Colt's Bicolor LED Tube has some other benefits when compared to large lighting systems such as saving energy.
- 14. Due to the features and benefits of Colt's Bicolor LED Tube, especially 13(a) to (e) above, in 2013, Paramount purchased a substantial number of Colt's Bicolor LED Tubes and introduced it in the rental department. Since introduction of Colt's Bicolor Tube light at Paramount, it has been used in about 90% of all new productions that Paramount supplies. This equates to about 18 of the 20 new productions per year.
- 15. The stages that are not using Colt's Bicolor LED Tube are usually where the production company needs a different style of lighting.

16. Colt's Bicolor Tube light has completely replaced fluorescent tube lights as the standard at Paramount.
17. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.
18. In signing this Declaration, I understand that the Declaration will be filed as evidence in a contested case before the Patent Trial and Appeal Board of the United States Patent and Trademark Office. I acknowledge that I may be subject to cross-examination in the case and that cross-examination will take place within the United States. If cross-examination is required of me, I will appear for cross-examination within the United States during the time allotted for cross-examination.
19. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 4 day of January 2024 at Hollywood, California.

A handwritten signature in black ink, appearing to read 'Bruce Wonderlick', is written over a horizontal line.

Name: Bruce Wonderlick

APPENDIX A



STAGES & BACKLOT

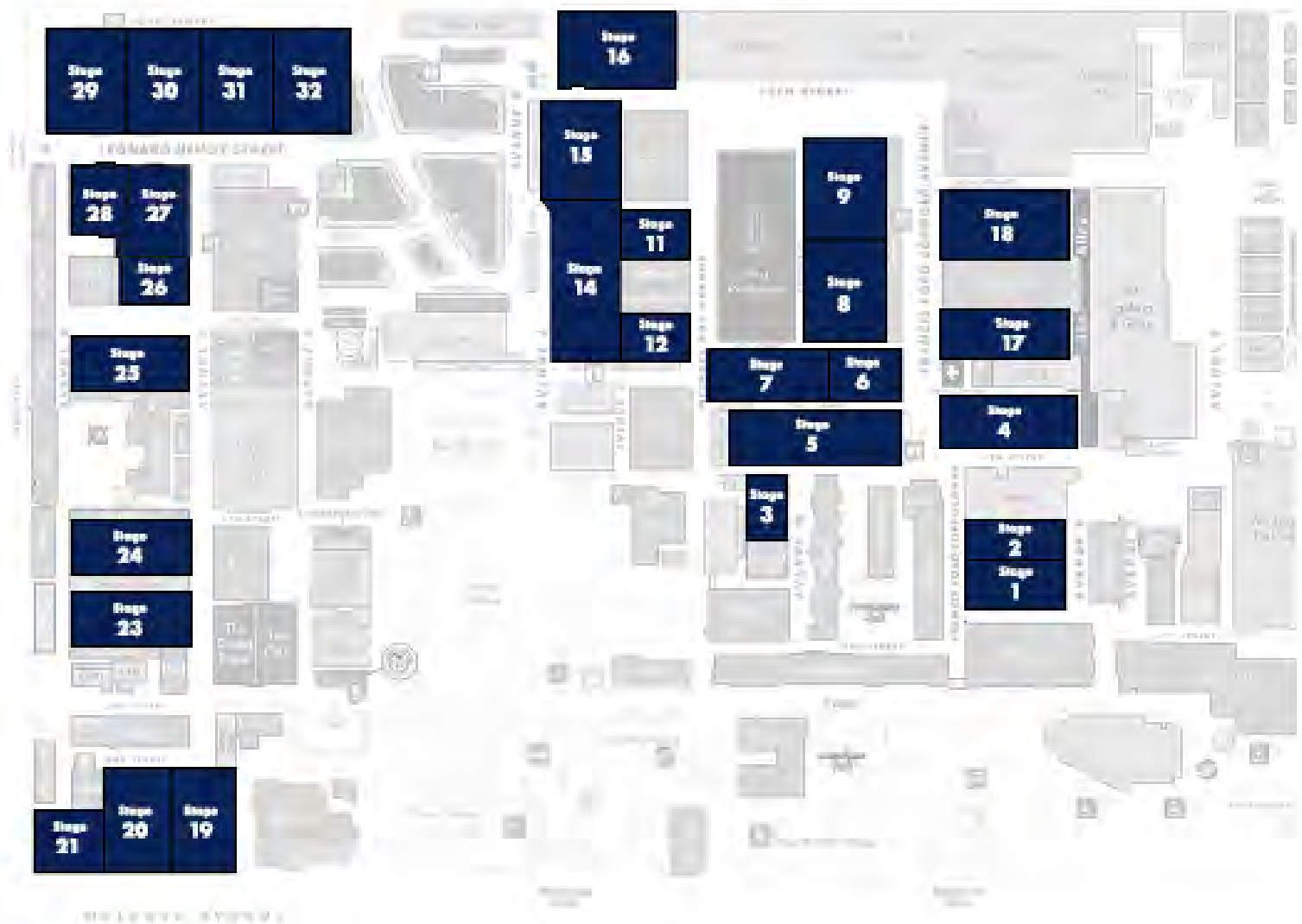
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APPENDIX B

THE STUDIOS ★★★★at★★★★ *Paramount*

