IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

JIAXING SUPER LIGHTING ELECTRIC APPLIANCE CO., LTD. AND OBERT, INC., *Plaintiffs*, v. CURRENT LIGHTING SOLUTIONS, LLC D/B/A GE CURRENT, *Defendant*.	Case No. 6:22-cv-00534-ADA **JURY TRIAL DEMANDED**

FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs Jiaxing Super Lighting Electric Appliance Co., Ltd. ("Super Lighting") and Obert, Inc. ("Obert") (collectively "Plaintiffs") hereby assert the following claims for patent infringement against Defendant Current Lighting Solutions LLC d/b/a GE Current.

THE PARTIES

1. Plaintiff Super Lighting is a corporation organized and existing under the laws of the People's Republic of China with its principal place of business at No. 1288 Jiachuang Rd., Xiuzhou Area, Jiaxing, Zhejiang, China.

2. Plaintiff Obert is the North American affiliate of Super Lighting and is a corporation organized under California law, with a principal place of business at 1380 Charles Willard St., Carson, CA 90746.

3. On information and belief, Defendant GE Current is a Delaware limited liability company. GE Current has a regular and established place of business at 103 Jessica Lane Unit A, Del Rio, TX.

4. This is an action for patent infringement. Plaintiffs bring this case to recover damages for willful patent infringement and to stop the unlicensed sale by GE Current of LED tube lamp products which infringe U.S. Patent Nos. 9,939,140 (the "'140 Patent"), 10,295,125 (the "'125 Patent"), 11,112,068 (the "'068 Patent"), 9,841,174 (the "'174 Patent"), 9,723,662 (the "'662 Patent"), 9,945,520 (the "'520 Patent"), 10,487,991 (the "'991 Patent"), 10,560,989 (the "'989 Patent"), 10,830,397 (the "'397 Patent"), 10,897,801 (the "'801 Patent"), and 11,441,742 (the "'742 Patent") (collectively, the "Patents-In-Suit").

BACKGROUND OF THE PARTIES

5. Super Lighting and Obert share a parent, Zhejiang Super Lighting Electric Appliance Co. Ltd. (collectively in this section the three companies are referred to as the "Super Lighting Group").

6. With approximately 2,000 employees worldwide, the Super Lighting Group is focused on creating more environmentally friendly and sustainable products, such as its full range of energy efficient tube lighting products from fluorescent lamps to LED lighting. The Super Lighting Group is an industry leading manufacturer who is a major supplier of LED tubes to many brand name companies in the United States and throughout the world.

7. Almost 30 years ago, in 1993, the Super Lighting Group was founded. Since then, the Super Lighting Group has conducted significant research, development, and innovation in the area of lighting technologies, including fluorescent and LED tube lamp products. The Super Lighting Group's investment and continuous innovation have driven progress across the lighting industry, including in the areas of safety, reliability and energy efficiency. The Super Lighting Group has a patent portfolio of over 1,000 issued patents and patent applications worldwide, primarily related to LED tube lamps.

8. GE Current imports, distributes, sells, and offers to sell the products accused of infringement in this case in this district, throughout Texas, and throughout the United States.

JURISDICTION AND VENUE

9. This action arises under the patent laws of the United States, 35 U.S.C. § 1 et seq. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

10. This Court has personal jurisdiction over GE Current. GE Current conducts business and has committed acts of patent infringement and/or has induced acts of patent infringement by others in this judicial district, the State of Texas, and elsewhere in the United States.

11. Personal jurisdiction by this Court over GE Current is appropriate at least under a specific jurisdiction and/or stream of commerce theory. Upon information and belief, GE Current imports LED tube lamp products, including the infringing products in this case, through several ports of entry throughout the United States. GE Current intends for its LED tube lamp products to be sold throughout the United States, including Texas. In addition, GE Current delivers LED tube lamp products, including the products accused of infringement in this case, into the stream of commerce with the expectation that they will be purchased by customers in Texas. GE Current intends to and actually does serve the Texas market, either directly or indirectly, with its LED tube lamp products. For example, GE current sells the products accused of infringement to at least Elliott Electric Supply Inc. ("Elliott"), which maintains retail locations throughout this district. GE Current is aware that its products will reach Texas, and is further aware that its LED tube lamp products are actually sold in Texas. These infringing products have been and continue to be purchased by and used by consumers in Texas (and in this District). GE Current's affirmative acts of providing instruction manuals and specification sheets for the accused products have induced, and continue to induce, GE Current's customers, and/or end users to use the accused products in their normal and customary way to infringe the asserted patents. The exercise of jurisdiction over GE Current would be fair and reasonable.

12. Personal jurisdiction by this Court over GE Current is also appropriate because GE Current has had and has substantial, continuous, and systematic contacts with this forum and

has purposefully availed itself of the benefits of conducting activities in the forum by purposefully directing its activities toward this state and this District, including by operating a regular and established place of business at 103 Jessica Lane Unit A in Del Rio, Texas. On information and belief, GE Current sells and offers for sale the products accused of infringement in this state, which it distributes through this location. GE Current, therefore, obtains the benefits and protections of the State of Texas' laws. This dispute arises out of and has a substantial connection with GE Current's contacts with this state and its infringement in this state, and the exercise of jurisdiction would be fair and reasonable.

13. Plaintiffs incorporate herein the allegations contained in the preceding paragraphs. Venue is proper in this judicial district pursuant to at least 28 U.S.C. § 1391 (b) and (c) and 28 U.S.C. § 1400(b). GE Current may be sued in this district because it has a regular and established place of business in this district, and because it commits acts of infringement (i.e., sells and offers to sell accused products) in this district. Specifically, GE Current has a regular and established place of business at 103 Jessica Lane Unit A in Del Rio, Texas. GE Current sells and/or offers for sale the products accused of infringement at this location and/or distributes the products accused of infringement from this location, including to customers in this district. In addition, this Court has already held venue of a patent litigation claim against Defendant is proper when it denied Defendant's motion to transfer venue. *See ALSI Holdings, LLC v. Current Lighting Solutions, LLC d/b/a GE Current,* Case No. 6-21-cv-01187, Dkt. No. 63 (W.D. Tex.).

14. Venue is also convenient in this district because this Court is already familiar with certain asserted patents in this case. Plaintiffs filed *Jiaxing Super Lighting Electric Appliance Co., Ltd. et al v. CH Lighting Technology Co. Ltd et al*, No. 6:20-cv-00018 ("CH Lighting") in this District on January 10, 2020, and further filed an amended complaint on March 16, 2020.

Plaintiffs asserted, inter alia, the '125 and '140 Patents. This Court held a claim construction hearing on October 22, 2020, and issued a claim construction order on October 24, 2020. This Court also heard numerous discovery disputes and substantive motions (including Daubert motions) relating to the subject matter of the asserted patents. The Court further presided over a jury trial on November 1-4, 2021 which resulted in a jury verdict that all asserted patents were valid and infringed by all defendants, including by GE Current products, and that the infringement by two defendants was willful.

THE PATENTS-IN-SUIT

15. Super Lighting is the current owner and assignee of over 200 U.S. Patents, including U.S. Patent Nos. 10,295,125 (the "'125 Patent"), 9,939,140 (the "'140 Patent"), 11,112,068 (the "'068 Patent"), 9,841,174 (the "'174 Patent"), 9,723,662 (the "'662 Patent"), 9,945,520 (the "'520 Patent"), 10,487,991 (the "'991 Patent"), 10,560,989 (the "'989 Patent"), 10,830,397 (the "'397 Patent"), 10,897,801 (the "'801 Patent"), and 11,441,742 (the "'742 Patent") (collectively, "the Patents-In-Suit"). Super Lighting has the right to bring and join actions by Obert to recover damages for Defendant's infringement of the Patents-In-Suit.

16. Obert is the exclusive licensee of the Patents-In-Suit and has the right to bring and join actions by Super Lighting to recover damages for Defendant's infringement of the Patents-In-Suit.

17. The '140 Patent duly and legally issued on April 10, 2018. The asserted claims of the '140 Patent are valid and enforceable. The '140 Patent is attached hereto as Exhibit 1.

18. The '125 Patent duly and legally issued on May 21, 2019. The asserted claims of the '125 Patent are valid and enforceable. The '125 Patent is attached hereto as Exhibit 2.

19. The ’068 Patent duly and legally issued on September 7, 2021. The asserted claims of the ’068 Patent are valid and enforceable. The ’068 Patent is attached hereto as Exhibit 3.

20. The ’174 Patent duly and legally issued on December 12, 2017. The asserted claims of the ’174 Patent are valid and enforceable. The ’174 Patent is attached hereto as Exhibit 4.

21. The ’662 Patent issued on August 1, 2017. The asserted claims of the ’662 Patent are valid and enforceable. The ’662 Patent is attached hereto as Exhibit 11.

22. The ’520 Patent issued on April 17, 2018. The asserted claims of the ’520 Patent are valid and enforceable. The ’520 Patent is attached hereto as Exhibit 12.

23. The ’991 Patent issued on November 26, 2019. The asserted claims of the ’991 Patent are valid and enforceable. The ’991 Patent is attached hereto as Exhibit 13.

24. The ’989 Patent issued on February 11, 2020. The asserted claims of the ’989 Patent are valid and enforceable. The ’989 Patent is attached hereto as Exhibit 14.

25. The ’397 Patent issued on November 10, 2020. The asserted claims of the ’397 Patent are valid and enforceable. The ’397 Patent is attached hereto as Exhibit 15.

26. The ’801 Patent issued on January 19, 2021. The asserted claims of the ’801 Patent are valid and enforceable. The ’801 Patent is attached hereto as Exhibit 16.

27. The ’742 Patent issued on September 13, 2022. The asserted claims of the ’742 Patent are valid and enforceable. The ’742 Patent is attached hereto as Exhibit 17.

GE CURRENT’S KNOWLEDGE OF PATENTS-IN-SUIT

28. Prior to filing suit, Plaintiffs reached out to GE Current on numerous occasions in order to seek a business relationship manufacturing Plaintiffs’ patented, high-quality LED Tube

Lamps for GE Current. In the course of those discussions, Plaintiffs informed GE Current about their rights to the Patents-In-Suit. However, GE Current, with knowledge of Plaintiffs' patent rights, chose instead to purchase infringing LED Tube Lamps from other suppliers, including the *CH Lighting* defendants.

29. For example, on March 26, 2018, Barry Qin, Super Lighting's General Manager of sales, emailed Wang Zhiyong of GE Current, attaching a copy of the '174 Patent and making GE Current aware of the '174 Patent. A true and correct copy of that email is attached as Exhibit 5.

30. Plaintiffs and GE Current continued to discuss Plaintiffs' patent rights. For example, on April 7, 2020, Wang Dazhen of GE Current emailed Lois Jin of Super Lighting, saying "we know you have some patents on this part to protect your design. Could you help to share your patents. We need evaluate your design and take actions then." In response, Super Lighting prepared a list of patents in several groups and sent it to Mr. Wang, as well as Qi Yan of GE Current, on April 9, 2020. This list identified the '125 Patent, '140 Patent, '174 Patent, '662 Patent, '520 Patent, '989 Patent, and '991 Patent, making GE Current aware of the '125 Patent, '140 Patent, '174 Patent, '662 Patent, '520 Patent, '989 Patent, and '991 Patent. This email further identified the technical features to which these patents applied, what types of lamps the patents applied to, and described technical features of these patents. A true and correct copy of that email exchange and the attached list of patents is attached as Exhibit 6.

31. In the *CH Lighting* case, Plaintiffs sought discovery from GE Current regarding infringing GE Current products sold in the US, including products purchased from CH Lighting and/or sold to Elliott. A true and correct copy of a subpoena served to GE Current on March 3, 2021 is attached as Exhibit 7. The subpoena identified infringing GE products including the

"BDT" series of products, including without limitation the GE LED14BDT8/G4/840, and identified the '140 Patent and the '125 Patent as asserted patents in the case.

32. In the *CH Lighting* case, the defendants stipulated that all accused products infringed the '140 Patent and the '125 Patent, including all accused GE Current products either purchased from CH Lighting or sold to Elliott. The *CH Lighting* defendants disputed whether certain products (including GE Current products) having the LT2600 and LT2600G integrated shock protection circuits infringed the '140 Patent. However, after hearing fact and expert testimony about the operation of the LT2600 integrated circuit, the jury found that the accused products with the LT2600 and LT2600G circuit also infringed the '140 Patent. The Court granted Judgment as a Matter of Law that the defendants had failed to prove that the '125 Patent was invalid, and the jury found that the defendants had further failed to prove the '140 Patent invalid. The jury further found that the infringement by defendants CH Lighting Technology Co. Ltd. and Shaoxing Ruising Lighting Co., Ltd. was willful.

33. GE Current was on notice of the *CH Lighting* case through having been served with a subpoena in the litigation, and because the case was a matter of public record. For example, the infringement by GE Current products, including products having the LT2600 and LT2600G integrated circuits, was discussed in detail on the public record of the trial. Further, the *CH Lighting* verdict was reported in several news outlets, including Law.com, World IP Review, Law360, Bloomberg Law, Patent Lawyer magazine, and Edison Report.

34. On March 19, 2021, Barry Qin of Super Lighting again contacted Gino Marella and Matthew Coury of GE Current, advising GE Current of the benefits of purchasing Super Lighting LED Tube Lamps and of Super Lighting's patent portfolio, including the '125 Patent,

'140 Patent, '174 Patent, '662 Patent, '520 Patent, '991 Patent, and '989 Patent. A true and correct copy of that email is attached as Exhibit 8.

35. On April 4, 2022, Plaintiffs' counsel sent Gino Marella, GE Current's Global Product General Manager, a letter which informed GE Current of its prior correspondence, that GE Current's BDT series of LED tube lamps were found to infringe the '140 Patent and the '125 Patent, and that GE Current also infringes the '174 Patent. The letter further ask that GE Current cease its infringing sales. A true and correct copy of that letter is attached as Exhibit 9.

36. On April 22, 2022, Plaintiffs' counsel sent an additional letter demanding that GE Current cease its infringing sales. Plaintiffs' counsel provided copies of previous correspondence sent to GE Current by Super Lighting regarding Super Lighting's patents (including Exhibits 5, 6, and 8), and identified specific representative products that had been found to infringe the '140 Patent and '125 Patent. A true and correct copy of that letter is attached as Exhibit 10.

37. Super Lighting's April 9, 2020 and March 19, 2021 emails (Exs. 6 and 8), and the April 4, 2022 letter from Super Lighting's counsel (Ex. 9), further identified Super Lighting's complete listing of its patents at http://jx.super-lamps.com/patent/. For example, the April 4, 2022 letter (Ex. 9) stated as follows:

> This list of patents contains some examples of patents that GE Current infringes. It does not contain the complete list of Super Lighting's patents, nor the complete list of Super Lighting patents GE Current infringes. As GE Current knows, a complete listing of Super Lighting's patents is located at http://jx.superlamps.com/patent/

38. As of April 4, 2022, Super Lighting's patent listing website, http://jx.super-lamps.com/patent/, identified each of the Patents-In-Suit. This patent listing website further identified the types of LED tube lamps that each patent applied to. Therefore, GE Current was

on notice of each Patent-In-Suit, and the type of LED tube lamp that each Patent-In-Suit applied to, as well as the fact that GE Current infringed multiple patents listed on Super Lighting's website.

39. Super Lighting further placed GE Current on notice of its infringement of the '140 Patent, '174 Patent, '125 Patent, and '068 Patent by filing the initial Complaint in this matter on May 24, 2022.

40. Despite being placed on notice of the Patents-In-Suit and its infringement of the Patents-In-Suit, GE Current has continued to sell products that infringe the Patents-In-Suit in violation of Plaintiff's patent rights.

41. On information and belief, GE Current chose to continue to purchase and sell infringing products because infringing products were less expensive than Plaintiffs' products.

42. For example, GE Current has continued to sell specific products that were found to infringe the '140 Patent and the '125 Patent in the *CH Lighting* case, including the LED14BDT8/G4/840, including products made by CH Lighting as well as other suppliers, as well as other products containing the LT2600 and LT2600G integrated circuit which contains the functionality found to infringe the '140 Patent. GE Current has continued to purchase such infringing products from CH Lighting and other suppliers in addition to CH Lighting, and has continued to sell such infringing products to Elliott as well as other distributors and customers.

43. GE Current had an obligation to investigate its infringement of the Patents-In-Suit due to the notices provided by Plaintiffs, GE Current's knowledge of the *CH Lighting* case and the infringement findings in the *CH Lighting* case, and the notice provided by Plaintiffs through the filing of the initial Complaint in this case.

Super Lighting Exhibit 2003

44. On information and belief, GE Current either investigated the Patents-In-Suit and did not identify reasonable defenses for its infringement, or willfully refused to investigate its infringement of the Patents-In-Suit.

45. GE Current has never provided any excuse for its continued infringement of Plaintiffs' patents.

46. GE Current has never ceased its infringement and continues to sell infringing products.

47. GE Current is also aware of the Patents-In-Suit and its ongoing infringement of them through the filing of this lawsuit, including the Complaint and the First Amended Complaint.

48. In addition to its own direct infringement, GE Current further induces others to directly infringe the Patents-In-Suit. GE Current distributes and sells infringing tube lamps in the United States with the knowledge that those tube lamps infringe the Patents-In-Suit and with the intent for distributors and customers to sell, offer to sell, and use infringing tube lamps. Distributors and end users directly infringe the Patents-In-Suit by selling, offering to sell, and using infringing products. GE Current encourages distributors and customers to directly infringe the Patents-In-Suit by advertising and providing support materials such as manuals and specification sheets. For example, GE Current's website, gecurrent.com, includes a document library which includes brochures, specification sheets, ballast compatibility guides, and installation sheets, which encourage customers to use infringing products in a manner which infringes the Patents-In-Suit.

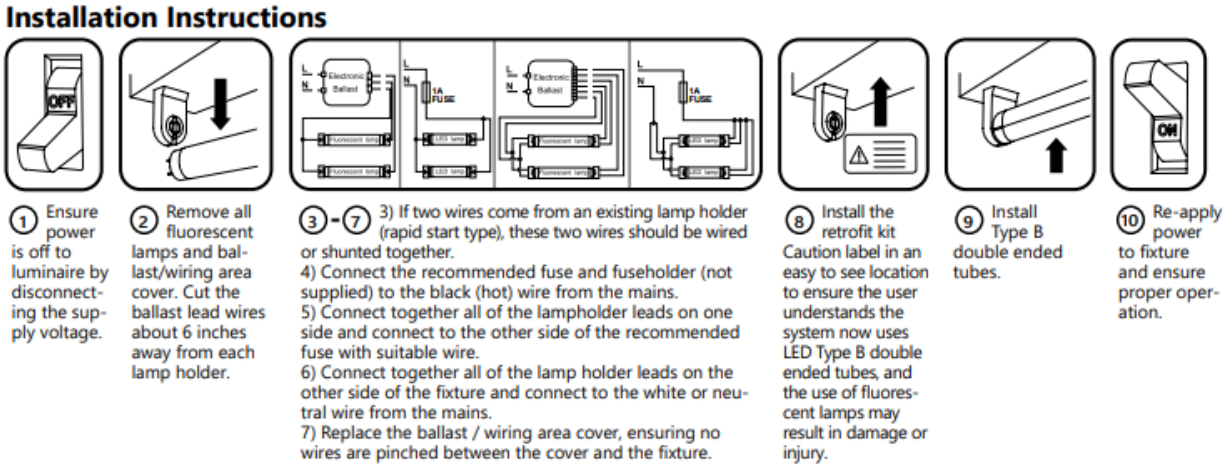
49. By way of further example, documents provided by GE Current as of August 2022 which encourage customers to use infringing products in an infringing manner include the

following: "LED covRguard Type B Tubes XL Spec Sheet" (http://images.salsify.com/images/mgu119vt5sreagvjzgkw/LEDL149-LED%20Tubes-T8-Type%20B-XL-covRguard-Spec-Sheet%20Final.pdf), "LED Type B Ballast Bypass Tubes Spec Sheet" (http://images.salsify.com/images/q4k2qokenr3yyzwuzqth/LEDL063-LED-Ballast-Bypass-LED-Tubes-Spec-Sheet.pdf), "LED Tubes T5 Type B covRguard Spec Sheet" (http://images.salsify.com/images/lst8z72yu9vyypijiapt/LEDL150-LED-Tubes-T5-Type%20B-covRguard-Spec-Sheet.pdf), "LED Tubes Ballast Compatibility Guide" (http://images.salsify.com/images/yfdubc7g8xeqqwzlotiw/LEDL122-LED-Tubes-Ballast-Compatibility-Brochure.pdf), "LED Tubes Brochure" (http://images.salsify.com/images/vcjsc2h1tqmnqehidhie/LEDL046-LED-Tubes-Brochure.pdf), "LED Type B Double Ended T5 HO + Efficiency Tubes Spec Sheet" (http://images.salsify.com/images/ulcczaix0dgevxwrey3s/LEDL081-LED-Type-B-Double-Ended-T5-HO-HE-Tubes-Spec-Sheet.pdf), "LED Type B T5 Tubes Installation Guide" (http://images.salsify.com/images/lpphrnawizp7nzmfxrdz/LEDL144-LED-Type-B-T5-Tubes-Installation-Guide.pdf), "LED 120-347V Type B T8 Tubes Installation Guide" (http://images.salsify.com/images/bd3vtiencwptzky1wlui/LEDL136-LED-120-347V-Type-B-T8-Tubes-Installation-Guide.pdf), "LED Type A Glass and Plastic 4ft Tubes Spec Sheet" (http://images.salsify.com/images/zeczrlhx5rhlivf3pnnw/LEDL057-LED-Type-A-Glass-and-Plastic-4ft-Tubes-Spec-Sheet.pdf), "LED Type A T8 Glass Tubes Spec Sheet" (http://images.salsify.com/images/jl17cizg98uejpokcv3l/LEDL022-LED-Type-A-T8-Glass-Tubes-Spec-Sheet.pdf), "LED Type A U6 Plastic Tubes Spec Sheet" (http://images.salsify.com/images/yyyfab9a77h0g0fs0bbm/LEDL036-LED-Type-A-U6-Plastic-Tubes-Spec-Sheet.pdf), "LED Type A T5 Glass Tubes Spec Sheet"

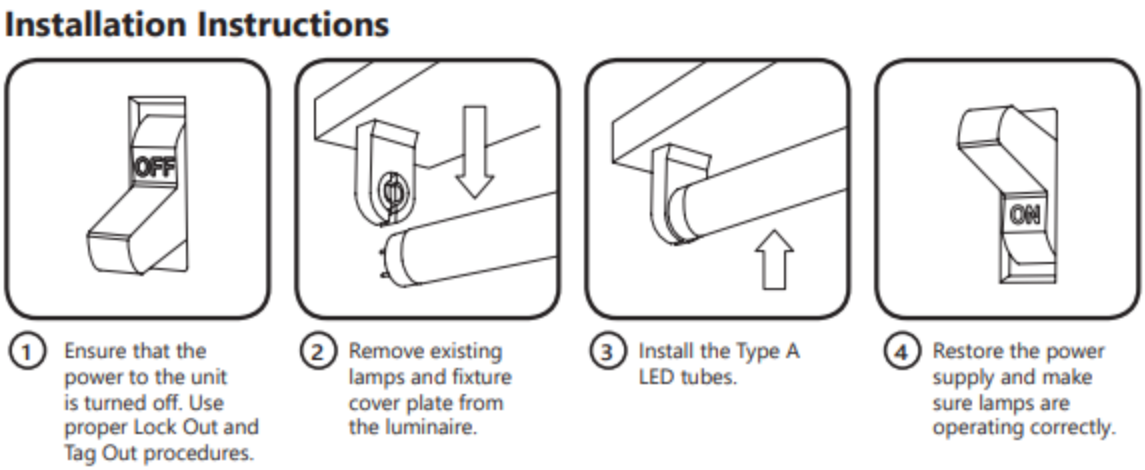
(http://images.salsify.com/images/bbsmriurvbjt0tk7d21p/LEDL045-LED-Integrated-Tubes-Type-A-T5-Glass-Tubes-Spec-Sheet.pdf), "LED Type A T8 Plastic Tubes Spec Sheet" (http://images.salsify.com/images/hoxdxupfqkmub3fa6d70/LEDL029-LED-Type-A-T8-Plastic-Tubes-Spec-Sheet.pdf), "LED Type A+B Dual Mode T8 Tubes Spec Sheet" (http://images.salsify.com/images/qpwqiz08x02qshxfnzkg/LEDL119-LED-Type-AB-Dual-Mode-T8-Tube-Spec-Sheet.pdf), "LED Tubes Type A covRguard Spec Sheet" (http://images.salsify.com/images/ftvrxyrwqzgsjc9ysx6d/LEDL092-LED-Tubes-Type-A-covRguard-Spec-Sheet.pdf), "LED Double Ended U-Tubes Spec Sheet" (http://images.salsify.com/images/kf0euoznshzfscm9b7xb/LEDL085-LED-Double-Ended-U-Tubes-Spec-Sheet.pdf), "LED Tubes Double Ended Type B Infographic" (http://images.salsify.com/images/urqbkkydfhard0odlkxl/LEDL070-LED-Tubes-Double-Ended-Type-B-Infographic.pdf), "LED Type B Double Ended 8 ft T8 HO Tubes Spec Sheet" (http://images.salsify.com/images/vsiskm5ksjq6oxwae1nw/LEDL097-LED-Type-B-Double-Ended-8-ft-T8-HO-Tubes-Spec-Sheet.pdf), "LED UL Type A T8 Tubes Application Guide" (http://images.salsify.com/images/xcey5sjxkuxv16uym5y0/LEDL079-LED-UL-Type-A-T8-Tubes-Application-Guide.pdf), "LED Type A and B Dual Mode T8 Tubes Installation Guide" (http://images.salsify.com/images/zvou4wga2fzonlhef2hw/LEDL118-LED-Type-AB-T8-Tubes-Installation-Guide.pdf), "LED Type A T8 Tubes Installation Guide" (http://images.salsify.com/images/yamugfcmj7xoam0iso5c/LEDL091-LED-Type-A-T8-Tubes-Installation-Guide.pdf), "LED Type B T8 Tubes Installation Guide" (http://images.salsify.com/images/o3bn2ahlkzklgz96v3oh/LEDL099-LED-Type-B-T8-Tubes-Installation-Guide.pdf), "LED Type B Double Ended Tubes XL Infographic" (http://images.salsify.com/images/jysfy8wud9temg5n4bva/LEDL087-LED-Tubes-Double-

Ended-T8-XL-Infographic.pdf), "Type A LED T8 Tubes System Performance Guide Data Sheet" (http://images.salsify.com/images/v6nnnrn8eyj7zorz4ilc/LEDL050-LED-Tubes-Performance-Guide.pdf), and "LED Tubes Infographic" (http://images.salsify.com/images/va7qwj3ad9vwt4ms7rgk/LEDL024-LED-Tubes-Infographic.pdf).

50. Such materials contain installation instructions encouraging customers to use accused products in an infringing manner. For example, the "LED 120-347V Type B T8 Tubes Installation Guide" (http://images.salsify.com/images/bd3vtiencwptzky1wlui/LEDL136-LED-120-347V-Type-B-T8-Tubes-Installation-Guide.pdf), contains instructions for installing accused Type B tubes to alternating current (AC) mains:



51. By way of further example, the "LED Type A T8 Tubes Installation Guide" (http://images.salsify.com/images/yamugfcmj7xoam0iso5c/LEDL091-LED-Type-A-T8-Tubes-Installation-Guide.pdf), contains installation instructions for installing Type A LED tubes with an existing electronic ballast:



COUNT 1

(Infringement of U.S. Patent No. 9,939,140)

52. Plaintiffs repeat and re-allege the allegations above as if fully set forth herein.

53. GE Current has infringed and continues to infringe one or more claims of the '140 Patent by making, using, offering to sell, selling, and/or importing into the United States infringing devices without authority in violation of 35 U.S.C. § 271(a). GE Current has actively induced infringement without authority in violation of 35 U.S.C. § 271(b). GE Current continues to induce infringement without authority in violation of 35 U.S.C. § 271(b).

54. GE Current has and continues to infringe, directly and indirectly, literally and under the doctrine of equivalents, at least claim 4 of the '140 Patent at least by using, offering to sell, importing, and/or selling at least the LED14BDT8/G4/840. For example, upon information and belief GE Current purchases the LED14BDT8/G4/840 from manufacturers in China, imports or encourages others to import the LED14BDT8/G4/840 into the United States, and distributes and sells the LED14BDT8/G4/840 in the United States with knowledge that the LED14BDT8/G4/840 infringes the '140 Patent and the intent for distributors and customers to sell, offer to sell, and use the LED14BDT8/G4/840 and similar infringing tube lamps.

Distributors and end users directly infringe the ’140 Patent by selling, offering to sell, and using infringing products including at least the LED14BDT8/G4/840 and other products which infringe in a similar manner.

55. The LED14BDT8/G4/840 satisfies each of the limitations of at least claim 4 of the ’140 Patent. Attached to this Amended Complaint as Exhibit 29 is a claim chart illustrating how all of the limitations of claim 4 of the ’140 Patent are satisfied by the GE LED14BDT8/G4/840.

56. On information and belief, GE Current makes, uses, offers to sell, sells, and/or imports into the United States additional LED tube lamps that infringe the ’140 Patent in a similar manner as the representative LED14BDT8/G4/840, including at least the GE Current models using the LT2600 or LT2600G integrated circuit and the models substantially similar to GE Current models such as the LED9BDT5G2/840HE, LED11BDT5/G2/840, LED13BDT8/G4/840XL, LED13ABT8/G4/840 and those found at Exhibit 29.

57. GE Current has committed and continues to commit acts of infringement that GE Current knew or should have known constituted an unjustifiably high risk of infringement of the ’140 Patent. GE Current is aware of the ’140 Patent and the infringement of the ’140 Patent by its products through Super Lighting's communications on April 9, 2020, March 19, 2021, April 4, 2022, April 22, 2022, through the subpoena served in the CH Lighting case, and through the filing of the initial and Amended Complaint in this case. GE Current has nevertheless continued to infringe the ’140 Patent without justification and in disregard of Super Lighting's patent rights. GE Current’s conduct has been egregious for at least the reasons set forth in the Complaint, including but not limited to its deliberate continued infringement while at the same time disregarding multiple communications from Super Lighting and the outcome of the *CH Lighting*

trial. GE Current's infringement of the '140 Patent has been and continues to be deliberate and willful, entitling Plaintiffs to an award of treble damages, reasonable attorney fees, and costs in bringing this action.

58. GE Current's direct and indirect infringement has caused and is continuing to cause damage and irreparable injury to Plaintiffs. Plaintiffs will continue to suffer damage and irreparable injury until that infringement is enjoined by this Court. Plaintiffs are entitled to preliminary and permanent injunctive relief and damages as a result of GE Current's infringement of the '140 Patent in accordance with 35 U.S.C. §§ 271, 281, 283, 284, and 285.

COUNT 2

(Infringement of U.S. Patent No. 10,295,125)

59. Plaintiffs repeat and re-allege the allegations above as if fully set forth herein.

60. GE Current has infringed and continues to infringe one or more claims of the '125 Patent by making, using, offering to sell, selling, and/or importing into the United States infringing devices without authority in violation of 35 U.S.C. § 271(a). GE Current has actively induced infringement without authority in violation of 35 U.S.C. § 271(b). GE Current continues to induce infringement without authority in violation of 35 U.S.C. § 271(b).

61. GE Current has and continues to infringe, directly and indirectly, literally and under the doctrine of equivalents, at least claim 2 of the '125 Patent at least by using, offering to sell, importing, and/or selling at least the LED11BDT5/G2/840. For example, upon information and belief GE Current purchases the LED11BDT5/G2/840 from manufacturers in China, imports or encourages others to import the LED11BDT5/G2/840 into the United States, and distributes and sells the LED11BDT5/G2/840 in the United States with knowledge that the LED11BDT5/G2/840 infringes the '125 Patent and the intent for distributors and customers to

sell, offer to sell, and use the LED11BDT5/G2/840 and similar infringing tube lamps. Distributors and end users directly infringe the '125 Patent by selling, offering to sell, and using infringing products including at least the LED11BDT5/G2/840 and other products which infringe in a similar manner.

62. The LED11BDT5/G2/840 satisfies all of the claim limitations of at least claim 2 of the '125 Patent. Attached to this Amended Complaint as Exhibit 18 is a claim chart illustrating how all of the limitations of claim 2 of the '125 Patent are satisfied by the GE LED11BDT5/G2/840.

63. On information and belief, GE Current makes, uses, offers to sell, sells, and/or imports into the United States additional LED tube lamps that infringe the '125 Patent in a similar manner as the representative LED11BDT5/G2/840, including at least the models substantially similar to GE Current models such as the LED9BDT5G2/840HE and those found at Exhibit 18.

64. GE Current has committed and continues to commit acts of infringement that GE Current knew or should have known constituted an unjustifiably high risk of infringement of the '125 Patent. GE Current is aware of the '125 Patent and the infringement of the '125 Patent by its products through Super Lighting's communications on April 9, 2020, March 19, 2021, April 4, 2022, April 22, 2022, through the subpoena served in the CH Lighting case, and through the filing of the initial and Amended Complaint in this case. GE Current has nevertheless continued to infringe the '125 Patent without justification and in disregard of Super Lighting's patent rights. GE Current's conduct has been egregious for at least the reasons set forth in the Complaint, including but not limited to its deliberate continued infringement while at the same time disregarding multiple communications from Super Lighting and the outcome of the *CH*

Lighting trial. GE Current's infringement of the '125 Patent has been and continues to be deliberate and willful, entitling Plaintiffs to an award of treble damages, reasonable attorney fees, and costs in bringing this action.

65. GE Current's direct and indirect infringement has caused and is continuing to cause damage and irreparable injury to Plaintiffs. Plaintiffs will continue to suffer damage and irreparable injury until that infringement is enjoined by this Court. Plaintiffs are entitled to preliminary and permanent injunctive relief and damages as a result of GE Current's infringement of the '125 Patent in accordance with 35 U.S.C. §§ 271, 281, 283, 284, and 285.

COUNT 3

(Infringement of U.S. Patent No. 11,112,068)

66. Plaintiffs repeat and re-allege the allegations above as if fully set forth herein.

67. GE Current has infringed and continues to infringe one or more claims of the '068 Patent by making, using, offering to sell, selling, and/or importing into the United States infringing devices without authority in violation of 35 U.S.C. § 271(a). GE Current has actively induced infringement without authority in violation of 35 U.S.C. § 271(b). GE Current continues to induce infringement without authority in violation of 35 U.S.C. § 271(b).

68. GE Current has and continues to infringe, directly and indirectly, literally and under the doctrine of equivalents, at least claim 31 of the '068 Patent at least by using, offering to sell, importing, and/or selling at least the LED14BDT8/G4/840. For example, upon information and belief GE Current purchases the LED14BDT8/G4/840 from manufacturers in China, imports or encourages others to import the LED14BDT8/G4/840 into the United States, and distributes and sells the LED14BDT8/G4/840 in the United States with knowledge that the LED14BDT8/G4/840 infringes the '068 Patent and the intent for distributors and customers to

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sell, offer to sell, and use the LED14BDT8/G4/840 and similar infringing tube lamps. Distributors and end users directly infringe the '068 Patent by selling, offering to sell, and using infringing products including at least the LED14BDT8/G4/840 and other products which infringe in a similar manner.

69. The LED14BDT8/G4/840 satisfies each of the limitations of at least claim 31 of the '068 Patent. A claim chart illustrating how the GE LED14BDT8/G4/840 satisfies all limitations of claim 31 of the '068 Patent is attached to this Amended Complaint as Exhibit 27.

70. On information and belief, GE Current uses, offers to sell, sells, and/or imports into the United States additional LED tube lamps that infringe the '068 Patent in a similar manner as the representative LED14BDT8/G4/840, including at least the models substantially similar to GE Current models such as the LED13BDT8/G4/840XL and those found at Exhibit 27.

71. GE Current has committed and continues to commit acts of infringement that GE Current knew or should have known constituted an unjustifiably high risk of infringement of the '068 Patent. GE Current is aware of the '068 Patent and the infringement of the '068 Patent by its products through the filing of the initial and Amended Complaint in this case. GE Current has nevertheless continued to infringe the '068 Patent without justification and in disregard of Super Lighting's patent rights. GE Current's conduct has been egregious for at least the reasons set forth in the First Amended Complaint, including but not limited to its deliberate continued infringement after the filing of the initial Complaint in this matter. GE Current's infringement of the '068 Patent has been and continues to be deliberate and willful, entitling Plaintiffs to an award of treble damages, reasonable attorney fees, and costs in bringing this action.

72. GE Current's direct and indirect infringement has caused and is continuing to cause damage and irreparable injury to Plaintiffs. Plaintiffs will continue to suffer damage and irreparable injury until that infringement is enjoined by this Court. Plaintiffs are entitled to preliminary and permanent injunctive relief and damages as a result of GE Current's infringement of the '068 Patent in accordance with 35 U.S.C. §§ 271, 281, 283, 284, and 285.

COUNT 4

(Infringement of U.S. Patent No. 9,841,174)

73. GE Current has infringed and continues to infringe one or more claims of the '174 Patent by making, using, offering to sell, selling, and/or importing into the United States infringing devices without authority in violation of 35 U.S.C. § 271(a). GE Current has actively induced infringement without authority in violation of 35 U.S.C. § 271(b). GE Current continues to induce infringement without authority in violation of 35 U.S.C. § 271(b).

74. GE Current has and continues to infringe, directly and indirectly, literally and under the doctrine of equivalents, at least claim 28 of the '174 Patent at least by using, offering to sell, importing, and/or selling at least the LED14BDT8/G4/840. For example, upon information and belief GE Current purchases the LED14BDT8/G4/840 from manufacturers in China, imports or encourages others to import the LED14BDT8/G4/840 into the United States, and distributes and sells the LED14BDT8/G4/840 in the United States with knowledge that the LED14BDT8/G4/840 infringes the '174 Patent and the intent for distributors and customers to sell, offer to sell, and use the LED14BDT8/G4/840 and similar infringing tube lamps. Distributors and end users directly infringe the '174 Patent by selling, offering to sell, and using infringing products including at least the LED14BDT8/G4/840 and other products which infringe in a similar manner.

75. The LED14BDT8/G4/840 satisfies each of the limitations of at least claim 10 of the ’174 Patent. A claim chart illustrating how the GE LED14BDT8/G4/840 satisfies all limitations of claim 28 of the ’174 Patent is attached to this Amended Complaint as Exhibit 30.

76. On information and belief, GE Current makes, uses, offers to sell, sells, and/or imports into the United States additional LED tube lamps that infringe the ’174 Patent in a similar manner as the representative LED14BDT8/G4/840, including at least the GE Current models using the LT2600 or LT2600G integrated circuit and the models substantially similar to GE Current models such as the LED9BDT5G2/840HE, LED11BDT5/G2/840, LED13BDT8/G4/840XL, LED13ABT8/G4/840 and those found at Exhibit 30.

77. GE Current has committed and continues to commit acts of infringement that GE Current knew or should have known constituted an unjustifiably high risk of infringement of the ’174 Patent. GE Current is aware of the ’174 Patent and the infringement of the ’174 Patent by its products through Super Lighting's communications on March 26, 2018, April 9, 2020, March 19, 2021, April 4, 2022, April 22, 2022, and through the filing of the initial and Amended Complaint in this case. GE Current has nevertheless continued to infringe the ’174 Patent without justification and in disregard of Super Lighting's patent rights. GE Current’s conduct has been egregious for at least the reasons set forth in the Complaint, including but not limited to its deliberate continued infringement while at the same time disregarding multiple communications from Super Lighting. GE Current’s infringement of the ’174 Patent has been and continues to be deliberate and willful, entitling Plaintiffs to an award of treble damages, reasonable attorney fees, and costs in bringing this action.

78. GE Current’s direct and indirect infringement has caused and is continuing to cause damage and irreparable injury to Plaintiffs. Plaintiffs will continue to suffer damage and

irreparable injury until that infringement is enjoined by this Court. Plaintiffs are entitled to preliminary and permanent injunctive relief and damages as a result of GE Current's infringement of the '174 Patent in accordance with 35 U.S.C. §§ 271, 281, 283, 284, and 285.

COUNT 5

(Infringement of U.S. Patent No. 9,723,662)

79. Plaintiffs repeat and re-allege the allegations above as if fully set forth herein.

80. GE Current has infringed and continues to infringe one or more claims of the '662 Patent by making, using, offering to sell, selling, and/or importing into the United States infringing devices without authority in violation of 35 U.S.C. § 271(a). GE Current has actively induced infringement without authority in violation of 35 U.S.C. § 271(b). GE Current continues to induce infringement without authority in violation of 35 U.S.C. § 271(b).

81. GE Current has and continues to infringe, directly and indirectly, literally and under the doctrine of equivalents, at least claim 23 of the '662 Patent at least by using, offering to sell, importing, and/or selling at least the LED14ET8/G/4/840. For example, upon information and belief GE Current purchases the LED14ET8/G/4/840 from manufacturers in China, imports or encourages others to import the LED14ET8/G/4/840 into the United States, and distributes and sells the LED14ET8/G/4/840 in the United States with knowledge that the LED14ET8/G/4/840 infringes the '662 Patent and the intent for distributors and customers to sell, offer to sell, and use the LED14ET8/G/4/840 and similar infringing tube lamps. Distributors and end users directly infringe the '662 Patent by selling, offering to sell, and using infringing products including at least the LED14ET8/G/4/840 and other products which infringe in a similar manner.

82. The LED14ET8/G/4/840 satisfies each of the limitations of at least claim 23 of the ’662 Patent. Attached as Exhibit 19 is a chart illustrating how the LED14ET8/G/4/840 satisfies each of the limitations of claim 23 of the ’662 Patent.

83. On information and belief, GE Current makes, uses, offers to sell, sells, and/or imports into the United States additional LED tube lamps that infringe the ’662 Patent in a similar manner as the representative LED14ET8/G/4/840, including at least other GE Current ballast compatible LED tube lamps having substantially similar circuitry to the LED14ET8/G/4/840.

84. GE Current has committed and continues to commit acts of infringement that GE Current knew or should have known constituted an unjustifiably high risk of infringement of the ’662 Patent. GE Current is aware of the ’662 Patent and the infringement of the ’662 Patent by its products through Super Lighting's communications on April 9, 2020, and March 19, 2021 and through the filing of the Amended Complaint in this case. GE Current has nevertheless continued to infringe the ’662 Patent without justification and in disregard of Super Lighting's patent rights. GE Current’s conduct has been egregious for at least the reasons set forth in the Complaint, including but not limited to its deliberate continued infringement while at the same time disregarding multiple communications from Super Lighting. GE Current’s infringement of the ’662 Patent has been and continues to be deliberate and willful, entitling Plaintiffs to an award of treble damages, reasonable attorney fees, and costs in bringing this action.

85. GE Current’s direct and indirect infringement has caused and is continuing to cause damage and irreparable injury to Plaintiffs. Plaintiffs will continue to suffer damage and irreparable injury until that infringement is enjoined by this Court. Plaintiffs are entitled to

preliminary and permanent injunctive relief and damages as a result of GE Current's infringement of the '662 Patent in accordance with 35 U.S.C. §§ 271, 281, 283, 284, and 285.

COUNT 6

(Infringement of U.S. Patent No. 9,945,520)

86. Plaintiffs repeat and re-allege the allegations above as if fully set forth herein.

87. GE Current has infringed and continues to infringe one or more claims of the '520 Patent by making, using, offering to sell, selling, and/or importing into the United States infringing devices without authority in violation of 35 U.S.C. § 271(a). GE Current has actively induced infringement without authority in violation of 35 U.S.C. § 271(b). GE Current continues to induce infringement without authority in violation of 35 U.S.C. § 271(b).

88. GE Current has and continues to infringe, directly and indirectly, literally and under the doctrine of equivalents, at least claim 1 of the '520 Patent at least by using, offering to sell, importing, and/or selling at least the LED13BDT8/G4/840XL. For example, upon information and belief GE Current purchases the LED13BDT8/G4/840XL from manufacturers in China, imports or encourages others to import the LED13BDT8/G4/840XL into the United States, and distributes and sells the LED13BDT8/G4/840XL in the United States with knowledge that the LED13BDT8/G4/840XL infringes the '520 Patent and the intent for distributors and customers to sell, offer to sell, and use the LED13BDT8/G4/840XL and similar infringing tube lamps. Distributors and end users directly infringe the '520 Patent by selling, offering to sell, and using infringing products including at least the LED13BDT8/G4/840XL and other products which infringe in a similar manner.

89. The LED13BDT8/G4/840XL satisfies each of the limitations of at least claim 1 of the '520 Patent. Attached as Exhibit 20 is a chart illustrating how the LED13BDT8/G4/840XL satisfies each of the limitations of claim 1 of the '520 Patent.

90. On information and belief, GE Current makes, uses, offers to sell, sells, and/or imports into the United States additional LED tube lamps that infringe the '520 Patent in a similar manner as the representative LED13BDT8/G4/840XL, including at least other GE Current LED tube lamps having substantially similar structures to the LED13BDT8/G4/840XL.

91. GE Current has committed and continues to commit acts of infringement that GE Current knew or should have known constituted an unjustifiably high risk of infringement of the '520 Patent. GE Current's conduct has been egregious for at least the reasons set forth in the First Amended Complaint, including but not limited to its deliberate continued infringement while at the same time disregarding multiple communications from Super Lighting. GE Current's infringement of the '520 Patent has been and continues to be deliberate and willful, entitling Plaintiffs to an award of treble damages, reasonable attorney fees, and costs in bringing this action.

92. GE Current's direct and indirect infringement has caused and is continuing to cause damage and irreparable injury to Plaintiffs. Plaintiffs will continue to suffer damage and irreparable injury until that infringement is enjoined by this Court. Plaintiffs are entitled to preliminary and permanent injunctive relief and damages as a result of GE Current's infringement of the '520 Patent in accordance with 35 U.S.C. §§ 271, 281, 283, 284, and 285.

COUNT 7

(Infringement of U.S. Patent No. 10,487,991)

93. Plaintiffs repeat and re-allege the allegations above as if fully set forth herein.

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94. GE Current has infringed and continues to infringe one or more claims of the ’991 Patent by making, using, offering to sell, selling, and/or importing into the United States infringing devices without authority in violation of 35 U.S.C. § 271(a). GE Current has actively induced infringement without authority in violation of 35 U.S.C. § 271(b). GE Current continues to induce infringement without authority in violation of 35 U.S.C. § 271(b).

95. GE Current has and continues to infringe, directly and indirectly, literally and under the doctrine of equivalents, at least claim 16 of the ’991 Patent at least by using, offering to sell, importing, and/or selling at least the LED13ET5G4/850HE. For example, upon information and belief GE Current purchases the LED13ET5G4/850HE from manufacturers in China, imports or encourages others to import the LED13ET5G4/850HE into the United States, and distributes and sells the LED13ET5G4/850HE in the United States with knowledge that the LED13ET5G4/850HE infringes the ’991 Patent and the intent for distributors and customers to sell, offer to sell, and use the LED13ET5G4/850HE and similar infringing tube lamps. Distributors and end users directly infringe the ’991 Patent by selling, offering to sell, and using infringing products including at least the LED13ET5G4/850HE and other products which infringe in a similar manner.

96. The LED13ET5G4/850HE satisfies each of the limitations of at least claim 16 of the ’991 Patent. Attached as Exhibit 21 is a chart illustrating how the LED13ET5G4/850HE satisfies each of the limitations of claim 16 of the ’991 Patent.

97. On information and belief, GE Current makes, uses, offers to sell, sells, and/or imports into the United States additional LED tube lamps that infringe the ’662 Patent in a similar manner as the representative LED13ET5G4/850HE, including at least other GE Current LED tube lamps having substantially similar structures to the LED13ET5G4/850HE.

98. GE Current has committed and continues to commit acts of infringement that GE Current knew or should have known constituted an unjustifiably high risk of infringement of the '991 Patent. GE Current is aware of the '991 Patent and the infringement of the '991 Patent by its products through Super Lighting's communications on April 9, 2020 and March 19, 2021 and through the filing of the Amended Complaint in this case. GE Current has nevertheless continued to infringe the '991 Patent without justification and in disregard of Super Lighting's patent rights. GE Current's conduct has been egregious for at least the reasons set forth in the First Amended Complaint, including but not limited to its deliberate continued infringement while at the same time disregarding multiple communications from Super Lighting. GE Current's infringement of the '991 Patent has been and continues to be deliberate and willful, entitling Plaintiffs to an award of treble damages, reasonable attorney fees, and costs in bringing this action.

99. GE Current's direct and indirect infringement has caused and is continuing to cause damage and irreparable injury to Plaintiffs. Plaintiffs will continue to suffer damage and irreparable injury until that infringement is enjoined by this Court. Plaintiffs are entitled to preliminary and permanent injunctive relief and damages as a result of GE Current's infringement of the '991 Patent in accordance with 35 U.S.C. §§ 271, 281, 283, 284, and 285.

COUNT 8

(Infringement of U.S. Patent No. 10,560,989)

100. Plaintiffs repeat and re-allege the allegations above as if fully set forth herein.

101. GE Current has infringed and continues to infringe one or more claims of the '989 Patent by making, using, offering to sell, selling, and/or importing into the United States infringing devices without authority in violation of 35 U.S.C. § 271(a). GE Current has actively

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induced infringement without authority in violation of 35 U.S.C. § 271(b). GE Current continues to induce infringement without authority in violation of 35 U.S.C. § 271(b).

102. GE Current has and continues to infringe, directly and indirectly, literally and under the doctrine of equivalents, at least claim 1 of the '989 Patent at least by using, offering to sell, importing, and/or selling at least the LED11BDT5/G2/840. For example, upon information and belief GE Current purchases the LED11BDT5/G2/840 from manufacturers in China, imports or encourages others to import the LED11BDT5/G2/840 into the United States, and distributes and sells the LED11BDT5/G2/840 in the United States with knowledge that the LED11BDT5/G2/840 infringes the '989 Patent and the intent for distributors and customers to sell, offer to sell, and use the LED11BDT5/G2/840 and similar infringing tube lamps. Distributors and end users directly infringe the '989 Patent by selling, offering to sell, and using infringing products including at least the LED11BDT5/G2/840 and other products which infringe in a similar manner.

103. The LED11BDT5/G2/840 satisfies each of the limitations of at least claim 1 of the '989 Patent. Attached as Exhibit 22 is a chart illustrating how the LED11BDT5/G2/840 satisfies each of the limitations of claim 1 of the '989 Patent.

104. On information and belief, GE Current makes, uses, offers to sell, sells, and/or imports into the United States additional LED tube lamps that infringe the '989 Patent in a similar manner as the representative LED11BDT5/G2/840, including at least other GE Current LED tube lamps having substantially similar structures to the LED11BDT5/G2/840.

105. GE Current has committed and continues to commit acts of infringement that GE Current knew or should have known constituted an unjustifiably high risk of infringement of the '989 Patent. GE Current is aware of the '989 Patent and the infringement of the '989 Patent by

its products through Super Lighting's communications on April 9, 2020 and March 19, 2021 and through the filing of the Amended Complaint in this case. GE Current has nevertheless continued to infringe the '989 Patent without justification and in disregard of Super Lighting's patent rights. GE Current's conduct has been egregious for at least the reasons set forth in the First Amended Complaint, including but not limited to its deliberate continued infringement while at the same time disregarding multiple communications from Super Lighting. GE Current's infringement of the '989 Patent has been and continues to be deliberate and willful, entitling Plaintiffs to an award of treble damages, reasonable attorney fees, and costs in bringing this action.

106. GE Current's direct and indirect infringement has caused and is continuing to cause damage and irreparable injury to Plaintiffs. Plaintiffs will continue to suffer damage and irreparable injury until that infringement is enjoined by this Court. Plaintiffs are entitled to preliminary and permanent injunctive relief and damages as a result of GE Current's infringement of the '989 Patent in accordance with 35 U.S.C. §§ 271, 281, 283, 284, and 285.

COUNT 9

(Infringement of U.S. Patent No. 10,830,397)

107. Plaintiffs repeat and re-allege the allegations above as if fully set forth herein.

108. GE Current has infringed and continues to infringe one or more claims of the '397 Patent by making, using, offering to sell, selling, and/or importing into the United States infringing devices without authority in violation of 35 U.S.C. § 271(a). GE Current induces infringement without authority in violation of 35 U.S.C. § 271(b) to the extent that it continues to encourage others to use, sell, and offer for sell infringing devices after being served with this Amended Complaint.

109. GE Current has and continues to infringe, directly and indirectly, literally and under the doctrine of equivalents, at least claim 8 of the '397 Patent at least by using, offering to sell, importing, and/or selling at least the LED13ET5G4/850HE, LED15ET8/G/4/840CVG, and LED15ET8/G/4/940. For example, upon information and belief GE Current purchases the LED13ET5G4/850HE, LED15ET8/G/4/840CVG, and LED15ET8/G/4/940 from manufacturers in China, imports or encourages others to import the LED13ET5G4/850HE, LED15ET8/G/4/840CVG, and LED15ET8/G/4/940 into the United States, and distributes and sells the LED13ET5G4/850HE, LED15ET8/G/4/840CVG, and LED15ET8/G/4/940 in the United States with knowledge that the LED13ET5G4/850HE, LED15ET8/G/4/840CVG, and LED15ET8/G/4/940 infringe the '397 Patent and the intent for distributors and customers to sell, offer to sell, and use the LED13ET5G4/850HE, LED15ET8/G/4/840CVG, and LED15ET8/G-4-940 and similar infringing tube lamps. Distributors and end users directly infringe the '397 Patent by selling, offering to sell, and using infringing products including at least the LED13ET5G4/850HE, LED15ET8/G/4/840CVG, and LED15ET8/G/4/940 and other products which infringe in a similar manner.

110. The LED13ET5G4/850HE, LED15ET8/G/4/840CVG, and LED15ET8/G/4/940 satisfy each of the limitations of at least claim 8 of the '397 Patent. Attached as Exhibits 23-25 are charts illustrating how the LED13ET5G4/850HE, LED15ET8/G/4/840CVG, and LED15ET8/G/4/940 satisfy each of the limitations of claim 8 of the '397 Patent.

111. On information and belief, GE Current makes, uses, offers to sell, sells, and/or imports into the United States additional LED tube lamps that infringe the '397 Patent in a similar manner as the representative LED13ET5G4/850HE, LED15ET8/G/4/840CVG, and LED15ET8/G/4/940, including at least other GE Current LED tube lamps having substantially

similar structures to the LED13ET5G4/850HE, LED15ET8/G/4/840CVG, and LED15ET8/G/4/940.

112. GE Current has committed and continues to commit acts of infringement that GE Current knew or should have known constituted an unjustifiably high risk of infringement of the '397 Patent. GE Current is aware of the '397 Patent and the infringement of the '397 Patent by its products at least through the filing of this Amended Complaint. To the extent that GE Current continues to infringe the '397 Patent after the filing of this Amended Complaint, it does so in willful disregard of Super Lighting's patent rights. GE Current's continued infringement of the '397 Patent is deliberate and willful, entitling Plaintiffs to an award of treble damages, reasonable attorney fees, and costs in bringing this action.

113. GE Current's direct and indirect infringement has caused and is continuing to cause damage and irreparable injury to Plaintiffs. Plaintiffs will continue to suffer damage and irreparable injury until that infringement is enjoined by this Court. Plaintiffs are entitled to preliminary and permanent injunctive relief and damages as a result of GE Current's infringement of the '397 Patent in accordance with 35 U.S.C. §§ 271, 281, 283, 284, and 285.

COUNT 10

(Infringement of U.S. Patent No. 10,897,801)

114. Plaintiffs repeat and re-allege the allegations above as if fully set forth herein.

115. GE Current has infringed and continues to infringe one or more claims of the '801 Patent by making, using, offering to sell, selling, and/or importing into the United States infringing devices without authority in violation of 35 U.S.C. § 271(a). GE Current induces infringement without authority in violation of 35 U.S.C. § 271(b) to the extent that it continues to

encourage others to use, sell, and offer for sell infringing devices after being served with this Amended Complaint.

116. GE Current has and continues to infringe, directly and indirectly, literally and under the doctrine of equivalents, at least claim 1 of the '801 Patent at least by using, offering to sell, importing, and/or selling at least the LED13ABT8/G4/840. For example, upon information and belief GE Current purchases the LED13ABT8/G4/840 from manufacturers in China, imports or encourages others to import the LED13ABT8/G4/840 into the United States, and distributes and sells the LED13ABT8/G4/840 in the United States with knowledge that the LED13ABT8/G4/840 infringes the '801 Patent and the intent for distributors and customers to sell, offer to sell, and use the LED13ABT8/G4/840 and similar infringing tube lamps. Distributors and end users directly infringe the '801 Patent by selling, offering to sell, and using infringing products including at least the LED13ABT8/G4/840 and other products which infringe in a similar manner.

117. The LED13ABT8/G4/840 satisfies each of the limitations of at least claim 1 of the '801 Patent. Attached as Exhibit 26 is a chart illustrating how the LED13ABT8/G4/840 satisfies each of the limitations of claim 1 of the '801 Patent.

118. On information and belief, GE Current makes, uses, offers to sell, sells, and/or imports into the United States additional LED tube lamps that infringe the '801 Patent in a similar manner as the representative LED13ABT8/G4/840, including at least other GE Current LED tube lamps having substantially similar structures to the LED13ABT8/G4/840.

119. GE Current has committed and continues to commit acts of infringement that GE Current knew or should have known constituted an unjustifiably high risk of infringement of the '801 Patent. GE Current is aware of the '801 Patent and the infringement of the '801 Patent by

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its products at least through the filing of this Amended Complaint. To the extent that GE Current continues to infringe the '801 Patent after the filing of this Amended Complaint, it does so in willful disregard of Super Lighting's patent rights. GE Current's continued infringement of the '801 Patent is deliberate and willful, entitling Plaintiffs to an award of treble damages, reasonable attorney fees, and costs in bringing this action.

120. GE Current's direct and indirect infringement has caused and is continuing to cause damage and irreparable injury to Plaintiffs. Plaintiffs will continue to suffer damage and irreparable injury until that infringement is enjoined by this Court. Plaintiffs are entitled to preliminary and permanent injunctive relief and damages as a result of GE Current's infringement of the '801 Patent in accordance with 35 U.S.C. §§ 271, 281, 283, 284, and 285.

COUNT 11

(Infringement of U.S. Patent No. 11,441,742)

121. Plaintiffs repeat and re-allege the allegations above as if fully set forth herein.

122. GE Current has infringed and continues to infringe one or more claims of the '742 Patent by making, using, offering to sell, selling, and/or importing into the United States infringing devices without authority in violation of 35 U.S.C. § 271(a). GE Current has actively induced infringement without authority in violation of 35 U.S.C. § 271(b). GE Current continues to induce infringement without authority in violation of 35 U.S.C. § 271(b).

123. GE Current has and continues to infringe, directly and indirectly, literally and under the doctrine of equivalents, at least claim 1 of the '742 Patent at least by using, offering to sell, importing, and/or selling at least the LED13ABT8/G4/840. For example, upon information and belief GE Current purchases the LED13ABT8/G4/840 from manufacturers in China, imports or encourages others to import the LED13ABT8/G4/840 into the United States, and distributes

and sells the LED13ABT8/G4/840 in the United States with knowledge that the LED13ABT8/G4/840 infringes the '742 Patent and the intent for distributors and customers to sell, offer to sell, and use the LED13ABT8/G4/840 and similar infringing tube lamps. Distributors and end users directly infringe the '742 Patent by selling, offering to sell, and using infringing products including at least the LED13ABT8/G4/840 and other products which infringe in a similar manner.

124. The LED13ABT8/G4/840 satisfies each of the limitations of at least claim 1 of the '742 Patent. Attached as Exhibit 28 is a chart illustrating how the LED13ABT8/G4/840 satisfies each of the limitations of claim 1 of the '742 Patent.

125. On information and belief, GE Current makes, uses, offers to sell, sells, and/or imports into the United States additional LED tube lamps that infringe the '742 Patent in a similar manner as the representative LED13ABT8/G4/840, including at least other GE Current LED tube lamps having substantially similar structures and circuitry to the LED13ABT8/G4/840, LED9BDT5G2/840HE, LED11BDT5/G2/840, LED13BDT8/G4/840XL, LED13ABT8/G4/840 such as the GE Current models using the LT2600 or LT2600G integrated circuit.

126. GE Current has committed and continues to commit acts of infringement that GE Current knew or should have known constituted an unjustifiably high risk of infringement of the '742 Patent. GE Current is aware of the '742 Patent and the infringement of the '742 Patent by its products at least through the filing of this Amended Complaint. To the extent that GE Current continues to infringe the '742 Patent after the filing of this Amended Complaint, it does so in willful disregard of Super Lighting's patent rights. GE Current's continued infringement of the

'742 Patent is deliberate and willful, entitling Plaintiffs to an award of treble damages, reasonable attorney fees, and costs in bringing this action.

127. GE Current's direct and indirect infringement has caused and is continuing to cause damage and irreparable injury to Plaintiffs. Plaintiffs will continue to suffer damage and irreparable injury until that infringement is enjoined by this Court. Plaintiffs are entitled to preliminary and permanent injunctive relief and damages as a result of GE Current's infringement of the '742 Patent in accordance with 35 U.S.C. §§ 271, 281, 283, 284, and 285.

PRAYER FOR RELIEF

Plaintiffs pray for the following relief:

A. A judgment that Defendant has infringed one or more claims of each of the Patents-In-Suit;

B. A preliminary and permanent injunction enjoining Defendant and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert or participation with Defendant, from infringing the Patents-In-Suit;

C. An award of damages resulting from Defendant's acts of infringement in accordance with 35 U.S.C. § 284;

D. A judgment and order finding that Defendant's acts of infringement were egregious and willful and trebling damages under 35 U.S.C. § 284;

E. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding Plaintiffs their reasonable attorneys' fees against Defendant;

F. A judgment and order requiring Defendant to provide accountings and to pay supplemental damages to Plaintiffs, including, without limitation, prejudgment and post-judgment interest;

G. Any and all other relief to which Plaintiffs may show themselves to be entitled; and

H. An award of supplemental damages for any continuing post-verdict infringement up until final judgment.

JURY TRIAL DEMAND

Plaintiffs hereby demand a trial by jury of all issues so triable.

Super Lighting Exhibit 2003

Dated: September 16, 2022

Respectfully submitted,

PERKINS COIE LLP

/s/ Matthew C. Bernstein

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ATTORNEYS FOR PLAINTIFFS JIAXING SUPER LIGHTING ELECTRIC APPLIANCE CO., LTD. AND OBERT, INC.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing has been served upon all counsel of record, via the Court's CM/ECF system on September 16, 2022.

/s/Matthew C. Bernstein
Matthew C. Bernstein

Super Lighting Exhibit 2003