

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Hisense USA Corporation

Petitioner,

v.

Brightplus Ventures LLC,

Patent Owner

Case No. IPR2023-01385

U.S. Patent No. 7,690,812

**PATENT OWNER'S CONTINGENT MOTION TO AMEND UNDER 37
C.F.R. § 42.121**

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I. INTRODUCTION

Patent Owner Brightplus Ventures LLC (“Brightplus” or “Patent Owner”) respectfully submits this contingent request to substitute challenged claims 1, 12, 15, and 18 of U.S. Patent No. 7,690,812 (the “’812 Patent”). In the instituted trial, the Petitioner Hisense USA Corporation (“Hisense” or “Petitioner”) has challenged the patentability of claims 1-7, 10-12, 14-21, and 23 as obvious under 35 U.S.C. § 103, as follows:

- Claims 1, 12, 15, and 18 are obvious over Chou in view of the Knowledge of a POSITA (Ground 1).
- Claims 2-6, and 21 are obvious over Chou and Starry in view of the Knowledge of a POSITA (Ground 2).
- Claims 7, 10-11, 14, 16-17, 19-20, and 23 are obvious over Chou and Tabito in view of the Knowledge of a POSITA (Ground 3).

Patent Owner submits that this Motion satisfies the statutory and regulatory requirements for a motion to amend the claims under 35 U.S.C. § 316(d) and 37 C.F.R. § 42.121 because the proposed amendments: (i) do not enlarge the scope of the claims or introduce new subject matter; (ii) are responsive to at least one ground of unpatentability instituted in this proceeding; (iii) are supported by the disclosure of the originally-filed application; and (iv) are patentable over the closest known prior art Chou, Starry, and Tabito references asserted in the Petition.

II. MOTION TO AMEND IS CONTINGENT

Patent Owner submits that this Motion is contingent upon a finding in a final written decision that challenged claims 1, 12, 15, and 18 are unpatentable. Specifically, Patent Owner requests the following contingencies:

- if claims 1 and 12 are found to be unpatentable, substitute proposed amended claims 25 and 26.
- if claims 15 and 18 are found to be unpatentable, substitute proposed amended claims 27 and 28.

III. MOTION TO AMEND PILOT PROGRAM

Patent Owner requests that this Motion be subject to the MTA Pilot Program (84 F.R. 9497). This proceeding was instituted on Mar 14, 2024, *see* Paper 7, and thus qualifies for the MTA Pilot Program effective on March 15, 2019. Patent Owner requests preliminary guidance from the Board on this Motion and whether to file a revised motion to amend. Patent Owner reserves its right to file a revised motion to amend subject to the Board's preliminary guidance.

IV. A REASONABLE NUMBER OF CLAIMS ARE AMENDED

Under 37 C.F.R. §42.121(a)(3), a motion to amend may propose a reasonable number of substitute claims for each challenged claim. Generally, it is presumed “that only one substitute claim would be needed to replace each challenged claim,” but that presumption may be rebutted upon a showing of need. 37 C.F.R. § 42.121(a)(3); *Lectrosonics, Inc. v. Zaxcom, Inc.*, IPR2018-01129, Paper 15 at 4-5

(PTAB Feb. 25, 2019). “An amendment under this subsection may not enlarge the scope of the claims of the patent or introduce new matter.” 35 U.S.C. § 316(d)(3); *Pulse Elecs., Inc. v. U.D. Elec. Corp.*, No. 3:20-cv-01676-BEN-DEB, 2021 U.S. Dist. LEXIS 69938, at *22 (S.D. Cal. 2021). Patent Owner submits that this Motion complies with the requirement because Patent Owner proposes 4 substitute claims for 4 original claims. None of the proposed substitute claims include new matter.

V. THE PROPOSED AMENDMENTS RESPOND TO A GROUND OF UNPATENTABILITY INVOLVED IN THIS TRIAL

Under 37 C.F.R. § 42.121(a)(2)(i), the amendment(s) to the claims must be responsive to at least one ground of unpatentability involved in the trial. In the Institution Decision, the Board determined—in regard to each respective Ground—that:

- (i) “We have considered Petitioner’s evidence and arguments that the limitations of claim 1 are met by the teachings of Chou, as well as Patent Owner’s evidence and arguments to the contrary. Based on this preliminary record, we are persuaded that Petitioner has demonstrated sufficiently for purposes of institution that the teachings of Chou render obvious the limitations of independent claim 1.” (Institution Decision at 34)
- (ii) “We have considered the evidence and arguments of record with respect to dependent claims 2–6 and 21. Because we determine that

Petitioner demonstrates a reasonable likelihood of prevailing in its challenge to independent claim 1 under 35 U.S.C. § 103(a) as obvious over Chou, we are instituting an *inter partes* review on that challenge and we also institute *inter partes* review as to all challenges in the Petition, including Petitioner’s challenges to claims 2–6 and 21.” (Institution Decision at 34)

- (iii) “We have considered the evidence and arguments of record with respect to claims 7, 10, 11, 14, 16, 17, 19, 20, and 23. Because we determine that Petitioner demonstrates a reasonable likelihood of prevailing in its challenge to independent claim 1 under 35 U.S.C. § 103(a) as obvious over Chou, we are instituting an *inter partes* review on that challenge and we also institute *inter partes* review as to all challenges in the Petition, including Petitioner’s challenges to claims 7, 10, 11, 14, 16, 17, 19, 20, and 23.” (Institution Decision at 35)

As set forth below, the amendments recited in proposed substitute claims 25, 26, 27, and 28 add further new limitations that render the claim patentable over the closest known prior art — Chou, the combination of Chou with Starry, and the combination of Chou with Tabito cited in the Petition. Therefore, Patent Owner submits that the amendments recited in proposed substitute claims 25, 26, 27, and 28 are directly responsive to the grounds of unpatentability involved in the trial.

VI. THE PROPOSED AMENDMENTS DO NOT SEEK TO ENLARGE THE SCOPE OF THE CHALLENGED CLAIMS

The proposed amendments to the challenged claims of the '812 Patent are listed in **Appendix A** below. The proposed amendments are indicated with underlining for the additional limitations that have been added and strikethroughs for deletions. Under 35 U.S.C. § 316(d)(3) and 37 C.F.R. § 42.121(a)(2)(ii), a motion to amend may not seek to enlarge the scope of the challenged claims. This Motion satisfies the requirement because the amendments recited in proposed substitute claims 25, 26, 27, and 28 add further new limitations to the challenged claims and, thus, further narrow the scope of these claims.

With respect to substitute claim 25, independent claim 1 has been rewritten to include the addition of the claim limitation “wherein the reflector sheet comprises at least one aperture configured to be proximate to at least one solid state lighting element, wherein the reflector sheet does not contact the at least one solid state lighting element; and wherein the protruding feature is separate and positioned away from the at least one solid state lighting element” which further limits the claim’s scope to require the reflector sheet to comprise at least one aperture proximate to at least one solid state lighting element, without contacting the lighting element, and to require the protruding feature to be separate and positioned away from the lighting element.

With respect to substitute claim 26, original claim 12 has been substituted with a dependent claim from proposed substitute independent claim 25. The

limitation “wherein the reflector sheet covers and maintains a substantially flat surface over the protruding feature, wherein the flat surface is parallel to the surface of the substrate” further limits the claim’s meaning to require the reflector sheet to cover and maintain a substantially flat surface over the protruding feature, wherein the flat surface is parallel to the surface of the substrate.

With respect to substitute claim 27, independent claim 15 has been rewritten to include the addition of the claim limitation “wherein the reflector sheet comprises at least one aperture configured to be positioned around the at least one solid state lighting element, wherein the reflector sheet does not contact the at least one solid state lighting element; and wherein the protruding feature is separate and positioned away from the at least one solid state lighting element” which further limits the claim’s scope to require the reflector sheet to comprise at least one aperture positioned around at least one solid state lighting element, without contacting the lighting element, and to require the protruding feature to be separate and positioned away from the lighting element.

With respect to substitute claim 28, original claim 18 has been substituted with a dependent claim from proposed substitute independent claim 27. The limitation “wherein the reflector sheet covers and maintains a substantially flat surface over the protruding feature, wherein the flat surface is parallel to the surface of the substrate” further limits the claim’s meaning to require the reflector sheet to cover and maintain a substantially flat surface over the protruding feature, wherein

the flat surface is parallel to the surface of the substrate.

Patent Owner submits that the proposed amendments recited in substitute claims 25, 26, 27, and 28 further narrow the scope of original challenged claims 1, 12, 15, and 18, and therefore comply with the statutory and regulatory requirements of 35 U.S.C. § 316(d)(3) and 37 C.F.R. § 42.121(a)(2)(ii).

VII. THE PROPOSED AMENDMENTS DO NOT INTRODUCE NEW SUBJECT MATTER

Under 35 U.S.C. § 316(d)(3) and 37 C.F.R. § 42.121(a)(2)(ii), a motion to amend may not introduce new subject matter. Patent Owner submits this requirement is satisfied because the claim limitations recited in proposed substitute claims 25, 26, 27, and 28 find support in the specification of the '812 Patent.

A. Proposed Substitute Claim 25 Is Supported by the Specification of the '812 Patent

Support for the amendment in this proposed substitute claim can be found in the '812 Patent at FIGs 3-4, 5A, and 5B; 1:57-62; 5:5-29. The '812 Patent's demonstrates that the reflector can comprise an aperture(s) proximate to the solid state light emitter(s), where the aperture(s) does not touch the solid state light emitter(s) and where the protruding feature is separate and positioned away from the solid state light emitters. The '812 Patent contemplates a difference between the elements 14a and 14b, and subsequently elements 18 and 22 shown in Fig. 3 below, thus supporting proposed substitute claim 25.

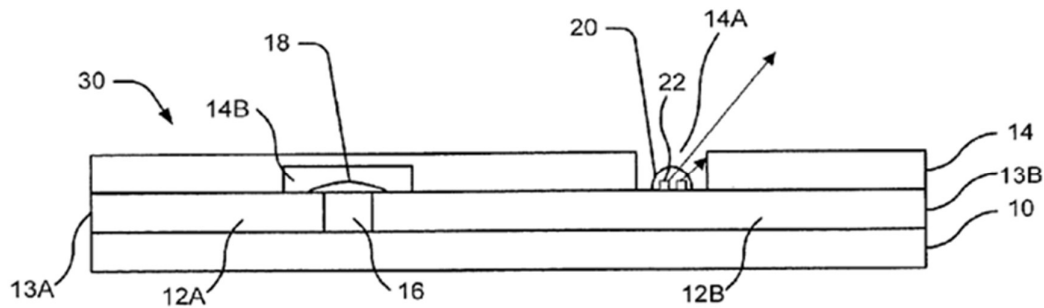


FIGURE 3

Furthermore, the specification states that “[i]n yet further embodiments, the reflector sheet can include an aperture configured to be positioned proximate to the solid state lighting element, wherein the reflector sheet does not contact the Solid state lighting element.” ’812 Patent at 1:58-62, 7:27-29 * (“The reflector sheet 60 includes multiple apertures 62 for receiving emitters on one or more solid state lighting bars.”); 8:17-19 (“The reflector sheet can include apertures that are configured to be aligned with the lighting elements.”); 2:16-20 (“In some embodiments, the reflector sheet can include an aperture configured to be positioned over the Solid state lighting element, wherein the reflector sheet does not contact the Solid state lighting element.”). Additionally, the ’812 Patent’s prosecution history differentiates the solid state light emitter(s) from the protruding feature. After an Office Action from the USPTO, Applicant argued that “the apertures cited in the Office Action are not synonymous with a reflector sheet conforming to a shape of a protruding feature.” EX 1002. at 127. Further clarifying, Applicant stated “an aperture might be provided to conform to a hole, which is substantially the opposite of a protruding feature. In

this regard, ‘a same shape, outline, or contour’ of a protruding feature would include a similarly protruding feature.” *Id.* at 154.

B. Proposed Substitute Claims 26 and 28 are Supported by the Specification of the '812 Patent

Proposed substitute claims 26 includes all of the limitations of proposed substitute claims 25, and substitute claim 28 includes all of the limitations of proposed substitute claims 27, with both claims 26 and 28 including the addition of the claim limitation “wherein the reflector sheet covers and maintains a substantially flat surface over the protruding feature, wherein the flat surface is parallel to the surface of the substrate.” Support for the amendment in claims 26 and 28 can be found in the '812 Patent at FIG 3; 1:57-62; 5:5-29. Specifically, the '812 Patent demonstrates that the diffuser sheet reflector sheet covers and maintains a substantially flat surface over the protruding feature with the flat surface being parallel to the surface of the substrate. For example, as is shown in Figure 3, the reflector sheet 14 covers protrusions, “such as, for example, a large wire interconnect (LWI) 18”. '812 Patent at 4:62-46. Because the reflector sheet 14 includes “recesses 14B configured to provide relief for surface protrusions, such as an LWI 18” it prevents “reflector sheet 14” rom “press[ing] against the LWI, potentially causing the LWI to break or pull away from substrate 13.” *Id.* at 5:10-11, 14-16. Additionally, the recesses, shown in figure 3, may be “molded into the reflector sheet 15 and/or created by removing material from the reflector sheet” thereby allowing the reflector sheet to cover and maintain a substantially flat surface

over the protrusion, as shown in figure 3, allowing the reflecting sheet to form a flat surface parallel to the surface of the substrate, shown in figure 3 as 13A and 13B.

C. Proposed Substitute Claim 27 is Supported by the Specification of the '812 Patent

For the same reasons as addressed above in relation to proposed substitute claim 25, support for proposed substitute Claim 27 can be found in the '812 Patent at FIGs 3-4, 5A, and 5B; 1:57-62; 5:5-29. Again, the '812 Patent's demonstrates that the reflector can comprise an aperture(s) proximate to the solid state light emitter(s), where the aperture(s) does not touch the solid state light emitter(s) and where the protruding feature is separate and positioned away from the solid state light emitters. The '812 Patent contemplates a difference between the elements 14a and 14b, and subsequently elements 18 and 22 shown in Fig. 3 below, thus supporting proposed substitute claim 25.

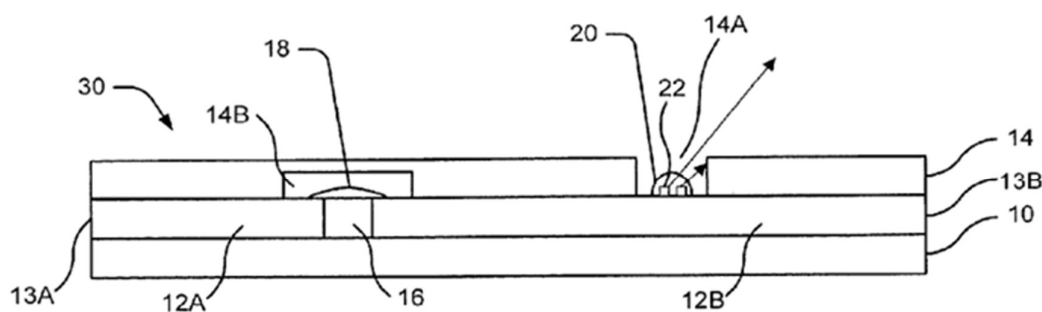


FIGURE 3

Furthermore, the specification states that “[i]n yet further embodiments, the reflector sheet can include an aperture configured to be positioned proximate to the solid state lighting element, wherein the reflector sheet does not contact the Solid state lighting

element.” ’812 Patent at 1:58-62, 7:27-29 * (“The reflector sheet 60 includes multiple apertures 62 for receiving emitters on one or more solid state lighting bars.”); 8:17-19 (“The reflector sheet can include apertures that are configured to be aligned with the lighting elements.”); 2:16-20 (“In some embodiments, the reflector sheet can include an aperture configured to be positioned over the Solid state lighting element, wherein the reflector sheet does not contact the Solid state lighting element.”). Additionally, the ’812 Patent’s prosecution history differentiates the solid state light emitter(s) from the protruding feature. After an Office Action from the USPTO, Applicant argued that “the apertures cited in the Office Action are not synonymous with a reflector sheet conforming to a shape of a protruding feature.” EX 1002. at 127. Further clarifying, Applicant stated “an aperture might be provided to conform to a hole, which is substantially the opposite of a protruding feature. In this regard, ‘a same shape, outline, or contour’ of a protruding feature would include a similarly protruding feature.” *Id.* at 154.

VIII. THE PROPOSED SUBSTITUTE CLAIMS 25-28 ARE PATENTABLE

D. Claim 25 Compared to Chou, Starry, and Tabito

Chou is a U.S. Patent titled “Light Source Assembly.” Chou is directed to a light source including a circuit board, a plurality of spot lighting sources and a reflector sheet on the circuit board. EX1005, Abstract.

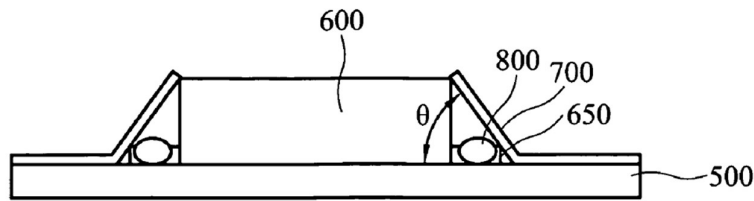


FIG. 3A

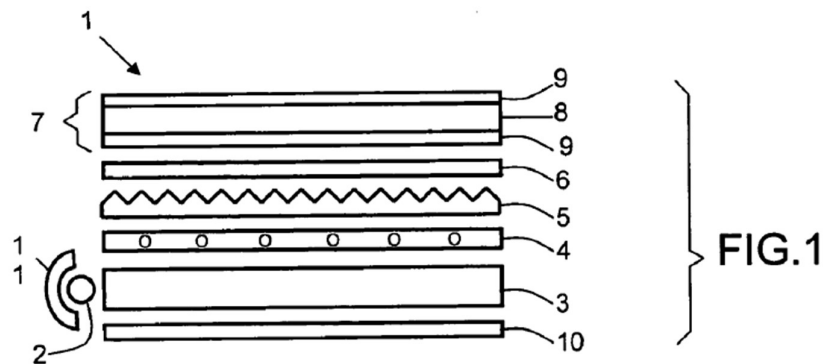
As shown in Fig 3A above, Chou discloses a “reflector sheet 700” provided on circuit board 500. EX1005, 3:65-4:7.

Chou is silent about an aperture not contacting the solid state lighting element, as well as a protruding feature being separate and positioned away from the lighting element. As shown in Fig 3A above, the reflector sheet 700 is only shown as touching the solid state element, and all of the elements Petitioner argues are equivalent to “protruding features” are positioned proximate to the solid state light emitter. To the extent that one would argue that the prior art cited by Chou, shown in Figs. 1A and 1B, satisfy this amendment, Patent Owner argues that neither embodiment shows a reflector sheet conforming to a shape of a protruding feature as required by claim 25.

This is the exact opposite of the invention of the '812 Patent, wherein the reflector sheet comprises an aperture that does not contact the solid state lighting element and a protruding feature that is separate from the solid state lighting element.

Patent Owner submits that Chou, by being wholly silent on the reflector sheet not touching the solid state element and a protruding feature separate from the solid state lighting element, does not render obvious proposed substitute claim 25, which specifically recites those elements.

Starry is a published U.S. Patent application titled “Diffuser Reflective Article.” Starry is directed to a diffuse reflector of light positioned within a structure defining an optical cavity. EX1006, Abstract.



As shown in Fig 1 above, Starry discloses a diffuse reflector 10 placed behind the light guide 3. EX1006, ¶0034.

Starry is silent about a reflector sheet that comprises an aperture proximate to a solid state lighting element, without contacting the lighting element, or a protruding feature that is positioned away from the lighting element. This is the exact opposite of the invention of the '812 Patent, wherein the reflector contains an aperture proximate to the solid state light element and a protruding feature that is separate from the light emitting element.

Tabito is a published U.S. Patent application titled “Backlight Device and Liquid Crystal Display Apparatus.” Tabito is directed to a light transmitting liquid crystal display apparatus containing a plurality of lighting emitting units and a reflective plate 26. EX1007, Abstract.



Tabito does not teach a reflector sheet that is not in contact with the LED, nor does Tabito teach a protruding feature separate from the lighting element. As shown in Fig 2 above, the reflective plate 26 directly contacts the LED 18. This is the exact

opposite of the invention of the '812 Patent, wherein the reflector contains an aperture proximate to, but not contacting, the solid state light element and a protruding feature that is separate from the light emitting element.

Patent Owner submits that Tabito, by being wholly silent on the reflector sheet containing an aperture proximate to, but not contacting, a solid state lighting element and a protruding feature, does not render obvious proposed claim 25, which specifically recites those elements.

E. Claims 26 and 28 Compared to Chou, Starry, and Tabito

Chou is discussed above, and the summary previously provided is incorporated by reference. Chou specifically describes an aperture 750 as an opening for the LED 600. EX1005, 3:4-41. In Chou, the aperture is not intended to cover the LED, as it would render the invention useless, since it would block all of the light emitted by the LED. Further, the region of the reflector 700 over the solder 800 and lead 650 is angled at an angle Θ and is not parallel with respect to the circuit board 500. Therefore, Chou does not disclose that the reflector sheet covers and maintains a substantially flat surface over a protruding feature, wherein the flat surface is parallel to the substrate.

Patent Owner submits that because Chou does not disclose a reflector sheet covering and maintaining a substantially flat surface over the protruding feature, wherein the flat surface is parallel to the surface of the substrate, it does not render obvious proposed substitute claims 26 and 28, which specifically recites those

elements.

Starry is discussed above, and the summary provided is incorporated by reference. Starry is silent about a protruding feature and a reflector that covers and maintains a substantially flat surface over the protruding feature, wherein the flat surface is parallel to the surface of the substrate. As shown in Fig. 1 above, reflector 10 is completely flat. In all the other embodiments there is no example of a reflector covering and maintaining a flat surface over a protruding feature. This is the exact opposite of the invention of the '812, wherein the reflector sheet covers and maintains a substantially flat surface over the protruding feature.

Patent owner submits that Starry, by being wholly silent on the reflector covering and maintaining a substantially flat surface over the protruding feature, wherein the flat surface is parallel to the surface of the substrate, does not render obvious proposed substitute claims 26 and 28, which specifically recite those elements.

Tabito is discussed above, and the summary provided is incorporated by reference. Tabito lacks disclosure of a protruding feature, and therefore the reflector sheet does not cover and maintain a substantially flat surface over the protruding feature, wherein the flat surface is parallel to the surface of the substrate. As shown in Fig 2 above, reflector 26 is completely flat and does not conform to the shape of a protruding feature. This is the exact opposite of the invention of the '812, wherein the reflector sheet covers and maintains a substantially flat surface over the

protruding feature.

Patent Owner submits that Tabito, by being wholly silent on the reflector covering and maintaining a substantially flat surface over the protruding feature, wherein the flat surface is parallel to the surface of the substrate, does not render obvious proposed substitute claims 26 and 28, which specifically recites those elements.

F. Claim 27 Compared to Chou, Starry, and Tabito

Chou is discussed above, and the summary provided is incorporated by reference. Chou is silent about an aperture not contacting the solid state lighting element, as well as a protruding feature being separate and positioned away from the lighting element. As shown in Fig 3A above, the reflector sheet 700 is only shown as touching the solid state element, and all of the elements Petitioner argues are equivalent to “protruding features” are positioned proximate to the solid state light emitter. To the extent that one would argue that the prior art cited by Chou, shown in Figs. 1A and 1B, satisfy this amendment, Patent Owner argues that neither embodiment shows a reflector sheet conforming to a shape of a protruding feature as required by claim 28.

This is the exact opposite of the invention of the '812 Patent, wherein the reflector sheet comprises an aperture that does not contact the solid state lighting element and a protruding feature that is separate from the solid state lighting element.

Patent Owner submits that Chou, by being wholly silent on the reflector sheet not touching the solid state element and a protruding feature separate from the solid state lighting element, does not render obvious proposed substitute claim 28, which specifically recites those elements.

Starry is discussed above, and the summary provided is incorporated by reference. Starry is silent about a reflector sheet that comprises an aperture positioned around the solid state lighting element, without contacting the lighting element, or a protruding feature that is positioned away from the lighting element. This is the exact opposite of the invention of the '812 Patent, wherein the reflector contains an aperture positioned around the solid state light element and a protruding feature that is separate from the light emitting element.

Patent Owner submits that Starry, by being wholly silent on the reflector sheet containing an aperture positioned around a solid state lighting element and a protruding feature that is separate from the light emitting element, does not render obvious proposed substitute claim 28, which specifically recites those elements.

Tabito is discussed above, and the summary provided is incorporated by reference. Tabito does not teach a reflector sheet that is not in contact with the LED, nor does Tabito teach a protruding feature separate from the lighting element. As shown in Fig 2 above, the reflective plate 26 directly contacts the LED 18. This is the exact opposite of the invention of the '812 Patent, wherein the reflector contains an aperture positioned around, but not contacting, the solid state light element and a

protruding feature that is separate from the light emitting element.

Patent Owner submits that Tabito, by being wholly silent on the reflector sheet containing an aperture positioned around, but not contacting, the solid state lighting element and a protruding feature, does not render obvious proposed claim 28, which specifically recites those elements.

G. The Advantages of the Amendments Recited in Proposed Substitute Claims 25, 26, 27 and 28

There are many advantages to the features recited in the amendments set forth in this Motion.

- One significant advantage of the amendments recited in claims 25 and 27 is that the increase space between the LEDs and the reflector is that it allows for the solid state lighting to experience thermal expansion without reducing any distortion in the reflector, thus keeping the light uniform. *See* '812 Patent at 7:29-38.
- Another significant advantage of the amendments recited in claims 25 and 27 is that the apertures for the lighting elements being separate from the protruding features will prevent low angle light emitted by the LED emitter chip from being blocked and will allow for uniform color light in all directions. *See* '812 Patent at 5:5-29.
- One significant advantage of the amendments recited in claims 26, and 28 is that the reflector maintains a significantly flat surface, which improves

light uniformity. *See* '812 Patent at 7:6-8.

IX. PRIORITY

All of the proposed substitute claims contain subject matter included in and supported by the original disclosure of the '812 Patent and, therefore, claim priority to the original disclosure.

X. REQUEST FOR PRELIMINARY GUIDANCE

As discussed in the call with the Board, Patent Owner requests preliminary guidance from the Board. Patent Owner understands this will be provided by a date four weeks after Due Date 2.

XI. CONCLUSION

For the reasons set forth herein, Patent Owner submits that proposed substitute claims 25, 26, 27, and 28 satisfy all of the statutory requirements for a motion to amend set forth in paragraphs (1) and (3) of 35 U.S.C. § 316(d) and paragraphs (a)(1), (a)(2), (a)(3), (b)(1) and (b)(2) of 37 C.F.R. § 42.121 and respectfully requests the Motion be granted contingent upon a finding that the challenged claims 1, 12, 15, and 18 are unpatentable.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that the above-captioned Mandatory Notice was served on counsel of record for the Petitioner by filing this document through the Patent Review Processing System as well as by delivering a copy via electronic mail to:

MFerrario@kilpatricktownsend.com (Lead Counsel)
MMorlock@kilpatricktownsend.com (Back-Up Counsel)

Dated June 14, 2024

/Neal Massand/

Neal Massand (Reg. No.
54,296)

APPENDIX A

(Proposed Amendments)

1.(original) A solid state lighting tile, comprising:

a substrate;

a solid state lighting element mounted on a surface of the substrate; and

a reflector sheet on the surface of the substrate, the reflector sheet configured to conform to a shape of a protruding feature on the tile.

12. (original) The tile of claim 1, wherein the reflector sheet comprises an aperture configured to be positioned proximate to the solid state lighting element, wherein the reflector sheet does not contact the solid state lighting element.

15. (original) A method of forming a solid state lighting device comprising:

providing a substrate of a solid state lighting tile;

mounting a solid state lighting element on a surface of the substrate; and

positioning a reflector sheet on the surface of the substrate, the reflector sheet configured to conform to a shape of a protruding feature of the solid state lighting tile.

18. (original) The method of claim 15, wherein the reflector sheet comprises an aperture configured to be positioned over the solid state lighting element, wherein the reflector sheet does not contact the solid state lighting element.

25. (proposed substitute for Claim 1) A solid state lighting tile, comprising:

a substrate;

a solid state lighting element mounted on a surface of the substrate; and

a reflector sheet on the surface of the substrate, the reflector sheet configured to conform to a shape of a protruding feature on the tile., wherein the reflector sheet comprises at least one aperture configured to be proximate to the at least one solid state lighting element, wherein the reflector sheet does not contact the at least one solid state lighting element; and

wherein the protruding feature is separate and positioned away from the at least one solid state lighting element.

26. (proposed substitute for Claim 12) ~~The tile of claim 25, wherein the reflector sheet comprises an aperture configured to be positioned proximate to the solid state lighting element, wherein the reflector sheet does not contact the solid state lighting element.~~ wherein the reflector sheet covers and maintains a substantially flat surface over the protruding feature, wherein the flat surface is parallel to the surface of the substrate.

27. (proposed substitute for Claim 15) A method of forming a solid state lighting device comprising:

providing a substrate of a solid state lighting tile;

mounting a solid state lighting element on a surface of the substrate; ~~and~~

positioning a reflector sheet on the surface of the substrate, the reflector sheet configured to conform to a shape of a protruding feature of the solid state lighting tile, wherein the reflector sheet comprises at least one aperture configured to be positioned around the at least one solid state lighting element, where the reflector sheet does not contact the at least one solid state lighting element; and

wherein the protruding feature is separate and positioned away from the at least one solid state lighting element.

28. (proposed substitute for Claim 18) ~~The method of claim 27, wherein the reflector sheet comprises an aperture configured to be positioned over the solid state lighting element, wherein the reflector sheet does not contact the solid state lighting element.~~ wherein the reflector sheet covers and maintains a substantially flat surface over the protruding feature, wherein the flat surface is parallel to the surface of the substrate.