

From: [Trials](#)
To: [Nightingale, Joshua R.](#); [Trials](#); [DRP_PTABDecision](#)
Cc: [Devitt, William E.](#); [Swize, Jennifer L.](#); [Khatri, Vishal V.](#); [Messing, Jeffrey S.](#); [Oliver, Justin J.](#); [Carlin, John D.](#); [Dorsky, Jason M.](#); [Yam, Stephen K.](#); [Meyer, Charles J.](#); [Collins, Scott](#)
Subject: RE: IPR2024-00101 - Seeking leave to file response to Delegation Order
Date: Tuesday, December 30, 2025 4:38:47 PM

Petitioner is authorized to file a 3-page response, due no later than Tuesday, January 6, 2026, limited to addressing the arguments raised below. Patent Owner is authorized a 3-page reply, due no later than Monday, January 12, 2026.

From: Nightingale, Joshua R. <jrnightingale@jonesday.com>
Sent: Thursday, December 18, 2025 2:38 PM
To: Trials <Trials@USPTO.GOV>; [DRP_PTABDecision](#) <[DRP_PTABDecision@uspto.gov](#)>
Cc: [Devitt, William E.](#) <[wdevitt@jonesday.com](#)>; [Swize, Jennifer L.](#) <[jswize@jonesday.com](#)>; [Khatri, Vishal V.](#) <[vkhatri@jonesday.com](#)>; [Messing, Jeffrey S.](#) <[jmessing@jonesday.com](#)>; [Oliver, Justin J.](#) <[joliver@venable.com](#)>; [Carlin, John D.](#) <[jcarlin@venable.com](#)>; [Dorsky, Jason M.](#) <[jmdorsky@venable.com](#)>; [Yam, Stephen K.](#) <[syam@venable.com](#)>; [Meyer, Charles J](#) <[cjmeyer@uspatent.com](#)>; [Collins, Scott](#) <[scollins@uspatent.com](#)>
Subject: IPR2024-00101 - Seeking leave to file response to Delegation Order

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Dear DRP,

In IPR2024-00101, Petitioner Luminex International Co., Ltd. (“Luminex”) respectfully seeks leave to file a response to the Director’s Order (Paper 53) delegating Patent Owner Signify Holdings B.V.’s (“Signify”) request for Director Review to a Delegated Rehearing Panel (“DRP”). Specifically, Luminex seeks leave to file a response limited to three (3) pages.

The Director’s Order states that “it appears ... Petitioner did not specifically argue the disputed limitation in the Petition.” Paper 53 at 3 (addressing “at least one first coupling feature disposed on the body” in element 13b). In fact, the Petition broke claim 13 into individual elements (*i.e.*, preamble, 13a, 13b, 13c, 13d) and explained how each element is disclosed by Reiff, including, as relevant here, the “disputed limitation,” by (1) identifying the “body” in Reiff (control box 64), (2) showing it disposed “on” the electrical cord 56, and (3) explaining that, as a matter of electrical continuity and ordinary design, the control box necessarily includes terminal coupling features on its body that electrically couple to the cord, as supported by annotated figures and the expert declaration of Dr. Eden. See Pet. at 84-86 (for “a body” in element 13a, citing EX1013 (Reiff) at 4:28-36, Figure 2, and identifying Reiff’s “control box 64 ... includ[ing] switch 66” as disclosing the claimed “body”); Pet. at 86-87 (building on element 13a for element 13b’s “at least one first coupling feature disposed on the body, wherein the at least one first coupling feature is configured to electrically couple to an electrical cable of the luminaire,” citing EX1013 at 4:16-19, 6:18-20, Figure 2 and

showing that Reiff's "body" (control box 64) is "[l]ocated along electrical cord 56" and electrically coupled to the electrical cord 56, so it necessarily includes coupling features—*i.e.*, electrical terminals on the body—by which the control box 64 is electrically coupled to the cord); Pet. at 86-87 (citing EX1004 (Eden Decl.) at ¶¶ 343-345 and further explaining that a POSA would have understood these coupling features as being the body's input and output terminals implemented via well-known connectors (e.g., screw terminals, spade lugs, pins, etc.), and that without such connectors there would be no electrical continuity and Reiff's light fixture would not function).

Accordingly, good cause exists for Luminex's request to briefly address this threshold issue and the other issues identified in the Director's Order. See Paper 53 at 3.

Luminex has contacted Signify in this regard. Signify's positions are as follows: "(i) Signify opposes the request because the Director's Order is clear and correct, and Luminex has not shown good cause to conclude otherwise, and (ii) Luminex's email should not be considered because it presents improper argument. See Scheduling Order at 2 ("[t]he email must not contain substantive argument"); *Samsung Elec. Co., Ltd. v. Black Hills Media, LLC*, IPR2014-00717, Paper 6 at 2-3 (P.T.A.B. Jul. 10, 2014) (stating that an email argument "constitutes an unauthorized, off-the-record brief" under 37 CFR 42.20(b))."

If a call is deemed necessary, the parties can be available at the DRP's convenience.

Respectfully,
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