

Filed on behalf of: Signify Holdings B.V.

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LUMINEX INTERNATIONAL COMPANY LTD.,
and MENARD, INC.,
Petitioners,

v.

SIGNIFY HOLDINGS B.V.,
Patent Owner.

Case IPR2024-00101
U.S. Patent No. 10,299,336

**PATENT OWNER'S REPLY TO
PETITIONER'S RESPONSE TO DIRECTOR DELEGATION ORDER¹**

¹ Authorization to file this Reply was granted by the Board in an email sent
December 30, 2025. EX3104.

Petitioner’s Response (“Resp.”, Paper 55) to the Director’s Delegation Order (“DO”, Paper 53) misses the Director’s point entirely. When the Director stated that “Petitioner did not specifically argue the disputed limitation in the Petition” (DO, 3), he understood that the Petition attempted to address each claim element—indeed, the preceding DO page walked through the parties’ arguments. Instead, the Director agreed with Signify that “the Petition ... fails to address *how* Reiff’s coupling feature was ‘disposed on the body.’” DO, 2 (emphasis added).

The Petition’s attempt to address limitation [13b] is brief. Petition (Paper 1), 86-87. As Signify established, the Petition’s argument that Reiff’s control box 64 “must include” a coupling feature did not address *where* Reiff’s coupling feature is allegedly disposed on what body (“on” a body, “in” a body, or otherwise). POR (Paper 31), 40-42; Sur-Reply (Paper 41), 11-14; Director Review Request (“DRR”, Paper 49), 5-6, 11-12. Notably, the Response does not identify where the Petition identified a specific “coupling feature” disposed on a specific “body” in Reiff.

For instance, the Response includes no citation for its assertion that “the claimed ‘body’ is the switch body included within control box 64, and the Petition showed that any coupling features, even if enclosed within control box 64, are still disposed ‘on the body’ of the switch.” Resp., 3. No such argument exists in the Petition. Accordingly, what the Response downplays as an “in-versus-on misunderstanding” (Resp., 3) is the same critical flaw in the Petition repeatedly

highlighted by Signify, but misapprehended or overlooked by the Board.

For example, Signify's POR established that (i) Reiff is silent regarding the contents of control box 64, (ii) control box 64 is not a switch body at all (as Petitioner's expert conceded), and (iii) not all switches that could be used in control box 64 "must include" a coupling feature. POR, 40-42. These arguments directly refuted the Petition's sole application of Reiff to element [13b]—an *anticipation* theory based on what Reiff's control box allegedly "must include." Pet., 86-87.

Rather than responding with further evidence about what "must" be included in the control box, Petitioner's Reply introduced for the first time a combination of Reiff with a third-party slide switch that purportedly could be used inside control box 64, and pointed to a "body" and "coupling features" purportedly on that switch. Resp., 2; Reply (Paper 35), 27-28. For instance, after submitting its Reply, Petitioner's expert testified that the Petition's highlighted portion of the control box 64 "could be the body of the switch. It depends on the nature of the switch and the way it was manufactured." Sur-Reply, 13 (quoting EX2030, 140:12-141:14). Petitioner's Reply combination was not a simple expansion of what was argued in the Petition—it was improper gap-filling to pivot from an inherent anticipation theory concerning what control box 64 "must include" to an obviousness theory concerning what a POSA might include within control box 64. Sur-Reply, 11-14; DRR, 5-6, 11-12. Petitioner had an obligation to disclose its theories in the Petition,

and the Petition’s failure to identify a specific “coupling feature” disposed on a specific “body” is not license to “expand” in reply with new theories regarding what and where those elements “could be.” Sur-Reply, 11-14.

Accordingly, the Board’s fact finding that Reiff does not teach limitation [13b] for anticipation was correct, and comports with the undisputed evidence regarding Reiff’s disclosures. POR, 40-42; Sur-Reply, 11-14. By contrast, the Board’s finding that Reiff teaches the limitation for obviousness relies on improper argument and evidence regarding a ground raised for the first time in Reply. DO, 3. This error does not depend on an interpretation of “body” or “switch body”—let alone one raised for the first time in Petitioner’s Response and purportedly based on out-of-context parallel litigation documents not in the record. *See* Resp., 3. The error lies in what the Petition argued and specifically what it did **not** argue.

Finally, the Response seeks to limit the Panel’s review to only limitation [13b]. Resp., 1. The DO delegated Signify’s entire Director Review Request, including the CCT-related arguments presented for the preamble and limitation [13d]. DO, 3 (“the request for Director Review is delegated”; “whether the Board misapprehended or overlooked these issues, or otherwise erred”). As shown in the Director Review Request, the Board misapprehended or overlooked significant failures in the Petition stemming from Petitioner’s fundamental misunderstanding of “CCT,” thus establishing additional fatal flaws in the application of Reiff.

January 12, 2026

Respectfully submitted,

/Justin J. Oliver/

Justin J. Oliver (Reg. No. 44,986)

Venable LLP

600 Massachusetts Avenue, NW

Washington, D.C. 20001

Tel: (202) 721-5423

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served to Petitioners by causing it to be sent by email to counsel for Petitioners at the following email addresses:

jrnightingale@jonesday.com

wdevitt@jonesday.com

vkhatri@jonesday.com

[jmessaging@jonesday.com](mailto:jmessing@jonesday.com)

cjmeyer@uspatent.com

scollins@uspatent.com

Respectfully submitted,

January 12, 2026

/Justin J. Oliver/
Justin J. Oliver (Reg. No. 44,986)
Venable LLP
Tel: (202) 721-5423