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

EVERLIGHT ELECTRONICS CO., LTD, **Plaintiff,** **v.** **IKEA US RETAIL LLC, et al.,** **Defendants.**	 **Jury Trial Demanded** **Civil Action No. WA-23-CV-00481-AM**

PLAINTIFF EVERLIGHT ELECTRONICS CO., LTD'S DISCLOSURE OF ASSERTED CLAIMS AND INITIAL INFRINGEMENT CONTENTIONS

Plaintiff Everlight Electronics Co., Ltd ("Everlight") hereby serves its Disclosure of Asserted Claim and Initial Infringement Contentions.

Everlight reserves its right to supplement, amend, or revise these initial infringement contentions if new information about IKEA's products becomes available.

I. Disclosure of Asserted Claims and Initial Contentions

(a) Asserted Claims.

Everlight asserts that Defendant has and/or continues to directly infringe, and/or indirectly infringe by active inducement the following claims:

1. U.S. Pat. No. 9,905,742 B2 (the "'742 Patent").

Everlight asserts that Defendant infringes claims 1-2, 5-12, 15, and 20-21 of the '742 Patent (the "'742 Asserted Claims").

2. U.S. Pat. No. 7,554,126 B2 (the "'126 Patent").

Everlight asserts that Defendant infringes claims 1, 2, and 4-13 of the '126 Patent (the "'126 Asserted Claims").

3. U.S. Pat. No. 9,640,733 (the "'733 Patent").

Everlight asserts that Defendant infringes claims 1-6 of the '733 Patent (the "'733 Asserted Claim").

(b) Initial Infringement Contentions Claim Charts.

1. '742 Patent Initial Infringement Contentions.

Everlight's Initial Infringement Contentions claim charts for the'742 Patent are attached as Exhibit A to these disclosures, which sets forth where in each accused product each element of the '742 Asserted Claims is found.

As shown in Exhibit A, Everlight contends that each element of the '742 Asserted Claims is literally present in each accused product. To the extent that Defendant contends that certain elements are not literally present in the accused products, the elements are at least present under the Doctrine of Equivalents because the difference between the claim element(s) and Defendants infringement, if any, are insubstantial and the accused products perform substantially the same function, in substantially the same way, to achieve substantially the same result.

Everlight specifically reserves the right to amend or supplement its claim charts upon, e.g., obtaining design documentation for the LEDs accused of infringement of the '742 Patent and/or discovering new products that infringe the '742 Patent.

The accused products for the '742 patent are:

IKEA Ledare 5.5W E26

IKEA SOLHETTA LED bulb E12 450 lumen, globe opal

IKEA TRÅDFRI LED bulb E26 806 lumen, smart wireless dimmable/warm white globe

IKEA TRÅDFRI LED bulb E12 450 lumen, smart wireless dimmable/white spectrum globe

IKEA SOLHETTALED bulb E12 250 lumen, chandelier/opal

IKEA SOLHETTA LED bulb E12 450 lumen, chandelier/opal

IKEA SOLHETTA LED bulb E12 800 lm, dimmable/globe opal, 2 "

IKEA SOLHETTA LED bulb E26 800 lumen, globe opal, 5000 K

IKEA SOLHETTA LED bulb GU10 600 lumen, dimmable

IKEA SOLHETTA LED bulb E26 1600 lumen, dimmable/globe opal

IKEA SOLHETTA LED bulb PAR38 E26 900 lumen, dimmable, 2700 K

IKEA SOLHETTA LED bulb GU10 380 lumen, 5000 K

IKEA TRÅDFRI LED bulb E26 800 lumen, smart wireless dimmable/color and white spectrum globe

IKEA TRÅDFRI LED bulb GU10 380 lumen, smart wireless dimmable/white spectrum

IKEA TRÅDFRI LED bulb E12 450 lumen, smart wireless dimmable/white spectrum chandelier

IKEA TRÅDFRI LED bulb E26 800 lumen, smart wireless dimmable/white spectrum globe

IKEA TRÅDFRI LED bulb E26 450 lumen, smart wireless dimmable/white spectrum tube-shaped

IKEA TRÅDFRI LED bulb PAR38 E26 900 lumen, smart wireless dimmable/white spectrum

2. ’126 Patent Initial Infringement Contentions.

Everlight’s Initial Infringement Contentions claim charts for the’126 Patent are attached as Exhibit B to these disclosures, which sets forth where in each accused product each element of the ’126 Asserted Claims is found.

As shown in Exhibit B, Everlight contends that each element of the ’126 Asserted Claims is literally present in each accused product. To the extent that Defendant contends that certain elements are not literally present in the accused products, the elements are at least present under the Doctrine of Equivalents because the difference between the claim element(s) and Defendants infringement, if any, are insubstantial and the accused product(s) performs substantially the same function, in substantially the same way, to achieve substantially the same result.

Everlight specifically reserves the right to amend or supplement its claim charts upon, e.g., obtaining design documentation for the LEDs accused of infringement of the ’126 Patent.

The accused products for the ’126 patent are:

IKEA ROLLSBO LED bulb E26 140 lumen

IKEA TRADFRI LED bulb E26 250 lumen, smart wireless dimmable/warm white globe

IKEA MOLNART LED bulb E26 260 lumen, ellipse shaped multicolor, 6"

IKEA MOLNART LED bulb E26 140 lumen, globe gray clear glass, 5"

IKEA TRADFRI LED bulb E12 250 lumen, smart wireless dimmable/warm white chandelier

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3. ’733 Patent Initial Infringement Contentions.

Everlight’s Initial Infringement Contentions claim charts for the’733 Patent are attached as Exhibit C to these disclosures, which sets forth where in each accused product each element of the ’733 Asserted Claim is found.

As shown in Exhibit C, Everlight contends that each element of the ’733 Asserted Claim is literally present in each accused product. To the extent that Defendant contends that certain elements are not literally present in the accused products, the elements are at least present under the Doctrine of Equivalents because the difference between the claim element(s) and Defendants infringement, if any, are insubstantial and the accused products perform substantially the same function, in substantially the same way, to achieve substantially the same result.

Everlight specifically reserves the right to amend or supplement its claim charts upon, e.g., obtaining design documentation for the LEDs accused of infringement of the ’733 Patent.

The accused products for the ’733 patent are:

IKEA Ledare GX53 LED Bulb

IKEA Ledare 8.9W E26

IKEA Ryet LED bulb G4 100 lumen, opal, 2700 K

IKEA SOLHETTA LED bulb PAR20 E26 500 lumen, dimmable, 2700 K

IKEA SOLHETTA LED bulb GU10 380 lumen, dimmable

IKEA SOLHETTA LED bulb E26 1100 lumen, dimmable/globe opal, 4 "

IKEA SOLHETTA LED bulb E26 800 lumen, dimmable/globe opal

IKEA TRÅDFRI LED bulb GU10 400 lumen, smart wireless dimmable/warm white

IKEA TRÅDFRI LED bulb E26 800 lumen, smart wireless dimmable/color and white spectrum globe

(c) Priority Date.

For purposes of this litigation, the priority date for the ’742 Asserted Claims is no later than May 23, 2014.

For purposes of this litigation, the priority date for the ’126 Asserted Claims is no later than September 27, 2004.

For purposes of this litigation, the priority date for ’733 Asserted Claims is no later than May 23, 2014.

Copies of (1) documents relating to the conception and reduction to practice for each claimed invention, found after a diligent search reasonable under the circumstances, and (2) the file history for each patent in suit are being produced contemporaneously herewith.

This 22nd day of March, 2023.

Respectfully submitted,

LOCKE LORD LLP

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Counsel for Plaintiff Everlight Electronics Co. Ltd.

CERTIFICATE OF SERVICE

I certify that on March 22, 2024, I am causing this document to be served by email and/or electronic file transfer on all counsel of record.

/s/ Mark Hannemann
Mark Hannemann

EXHIBIT C

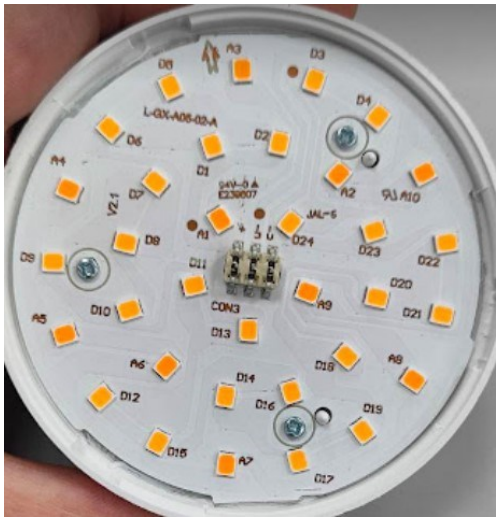
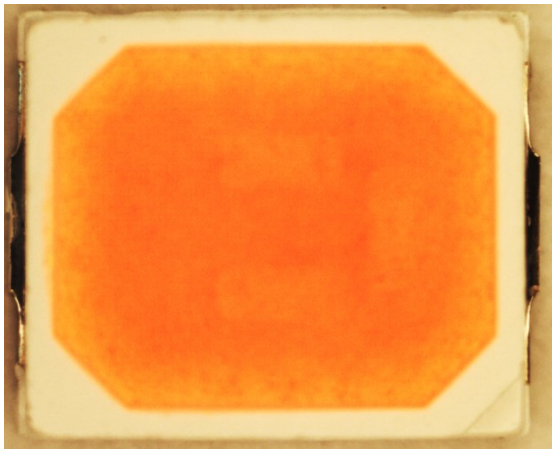
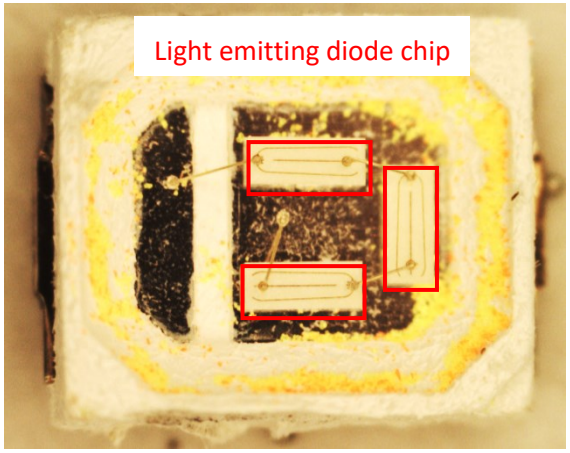
Infringement of U.S. Patent No. 9,640,733

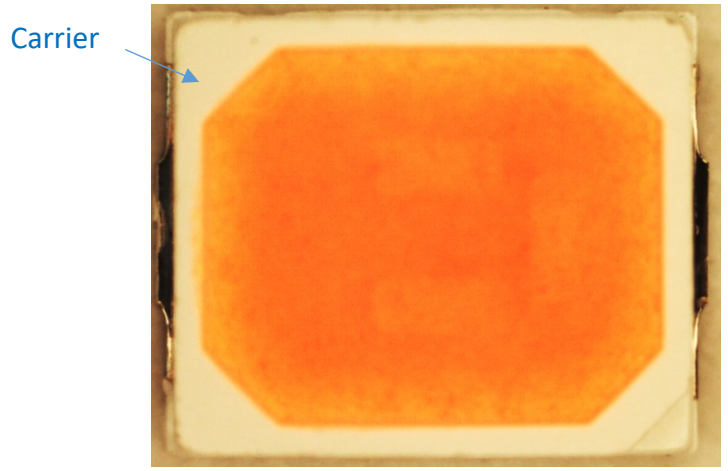
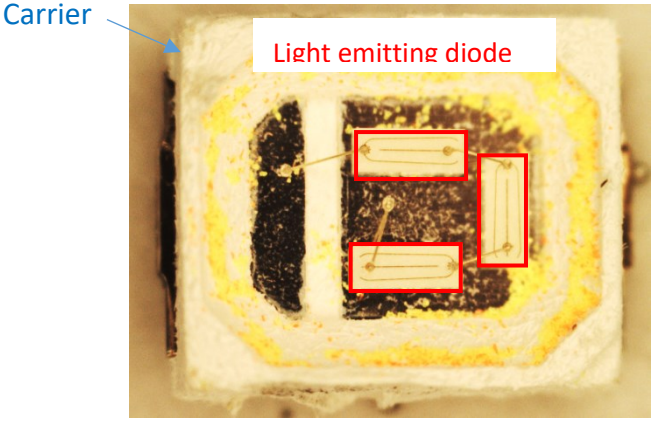
Everlight Electronics Co., Ltd.(“Everlight”) is accusing the following products manufactured, used, sold, and/or offered for sale in the United States, or imported into the United States, in the time period ranging from six years prior to the filing of Everlight’s complaint to present (the “’733 Accused Products”) of infringing claims 1-6 (the “’733 Asserted Claims”) of U.S. Pat. No. 9,640,733 (the “’733 Patent”).

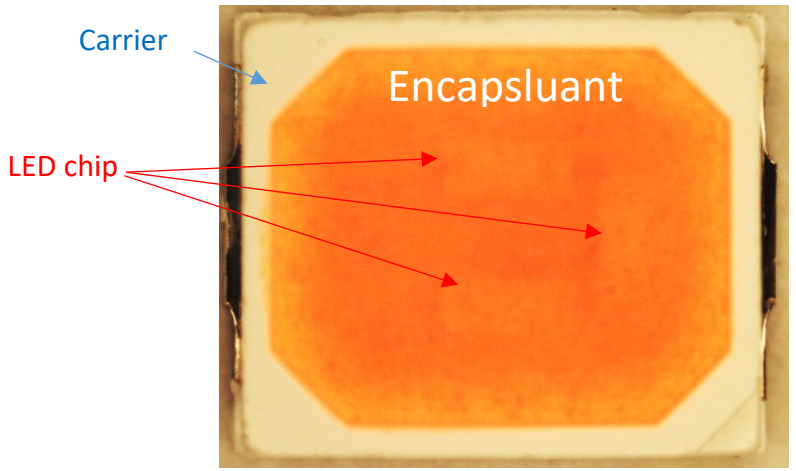
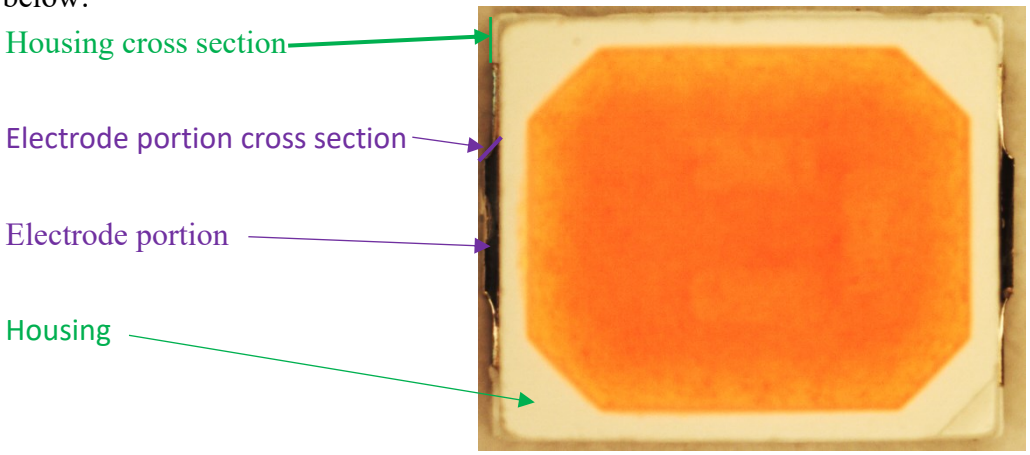
‘733 Accused Products
IKEA Ledare GX53 LED Bulb
IKEA Ledare 8.9W E26
IKEA Ryet LED bulb G4 100 lumen, opal, 2700 K
IKEA SOLHETTA LED bulb PAR20 E26 500 lumen, dimmable, 2700 K
IKEA SOLHETTA LED bulb GU10 380 lumen, dimmable
IKEA SOLHETTA LED bulb E26 1100 lumen, dimmable/globe opal, 4 "
IKEA SOLHETTA LED bulb E26 800 lumen, dimmable/globe opal
IKEA TRÅDFRI LED bulb GU10 400 lumen, smart wireless dimmable/warm white
IKEA TRÅDFRI LED bulb E26 800 lumen, smart wireless dimmable/color and white spectrum globe

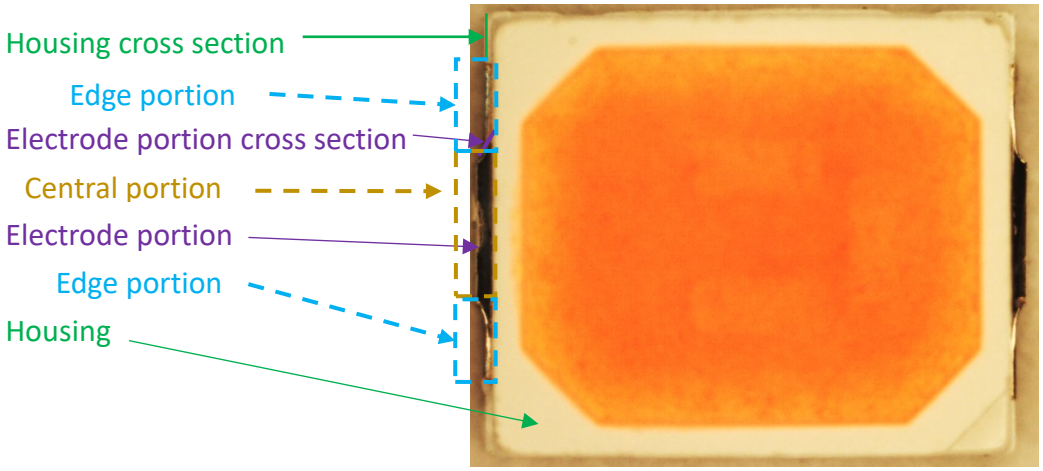
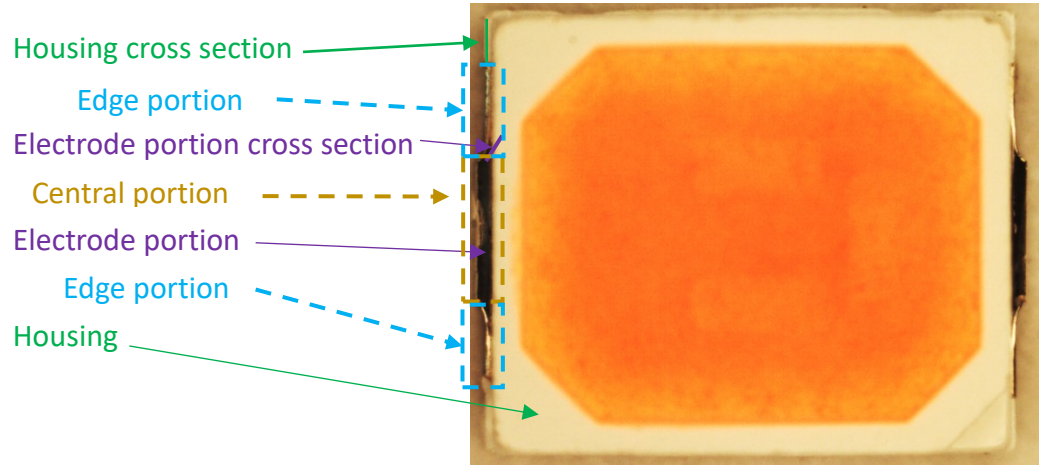
The detailed claim chart for the representative example set forth below is representative of, and applies to, all ’730 Accused Products, including the represented products following the claim chart, in which relevant elements are simply identified. The only differences Everlight has observed based on its investigation to date between the specific models of the ’733 Accused Products, including between the representative example and the represented products, are not material to infringement of the ’733 Asserted Claims, including for example, the number of LED chips, circuit board shape, emission wavelength of the LED chip and LED size.

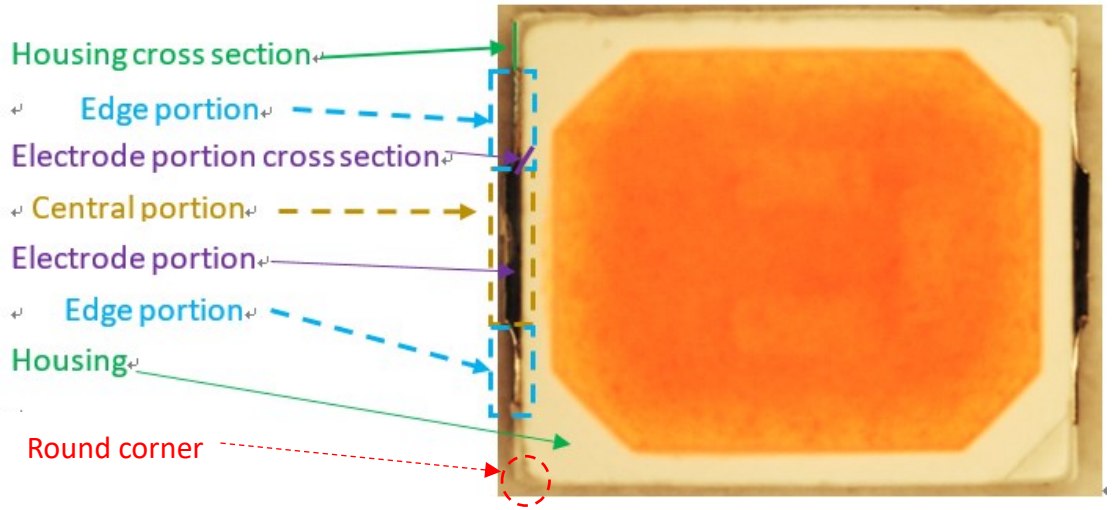
Infringement of of Claims 1-6 of U.S. Patent No. 9,640,733 by IKEA Ledare GX53 LED Bulb

U.S. Patent No. 9,640,733	Exemplary IKEA Ledare GX53 LED Bulb
1. A light emitting device, comprising:	The IKEA Ledare GX53 LED Bulb uses a light emitting device. For example, a panel of the exemplary IKEA Ledare GX53 LED Bulb as shown:     
1a) a carrier;	The IKEA Ledare GX53 LED Bulb uses a light emitting device comprising a carrier. One example of these elements within the IKEA Ledare GX53 LED Bulb is shown below:

	
1b) a light emitting diode (LED) chip carried within the carrier; and	The IKEA Ledare GX53 LED Bulb uses a light emitting device comprising a light emitting diode (LED) chip carried within the carrier. One example of these elements within the IKEA Ledare GX53 LED Bulb is shown below:
1c) an encapsulant covering the LED chip,	The IKEA Ledare GX53 LED Bulb uses a light emitting device comprising an encapsulant covering the LED chip. One example of these elements within the IKEA Ledare GX53 LED Bulb is shown below:

	
1d) wherein the carrier comprises: at least one electrode portion, each of the at least one electrode portion comprising at least an electrode portion cross section; and a housing comprising a housing cross section, the housing at least partially covering the at least one electrode portion, wherein the housing cross section and the electrode portion cross section are not level with one another;	The IKEA Ledare GX53 LED Bulb uses a light emitting device comprising the carrier including at least one electrode portion and a housing. Each of the at least one electrode portion comprises at least an electrode portion cross section. The housing at least partially covers the at least one electrode portion. The housing cross section and the electrode portion cross section are not level with one another. One example of these elements within the IKEA Ledare GX53 LED Bulb is shown below: 
1e) wherein each of the at least one electrode portion further comprises a central area and two edge areas, and	The IKEA Ledare GX53 LED Bulb uses a light emitting device comprising the carrier including the at least one electrode portion and the housing. Each of the at least one electrode portion further comprises a central area and two edge areas. The electrode portion cross section is located on at least one of the two edge areas. One example of

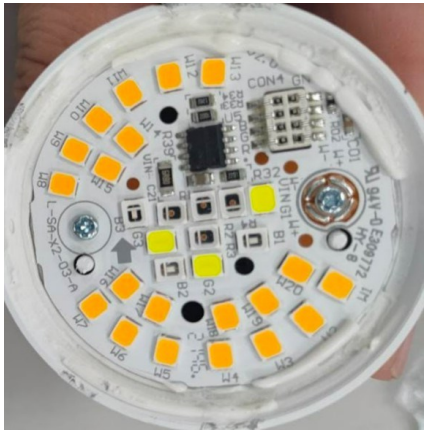
wherein the electrode portion cross section is located on at least one of the two edge areas;	these elements within the IKEA Ledare GX53 LED Bulb is shown below: 
1f) wherein the central area and the two edge areas protrude from the housing cross section; wherein the central area protrudes from the two edge areas.	The IKEA Ledare GX53 LED Bulb uses a light emitting device comprising the carrier including the at least one electrode portion and the housing. The central area and the two edge areas protrude from the housing cross section. The central area protrudes from the two edge areas. One example of these elements within the IKEA Ledare GX53 LED Bulb is shown below: 

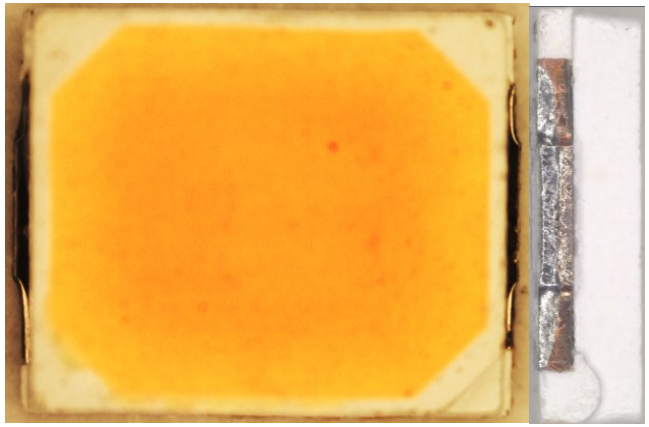
U.S. Patent No. 9,640,733	Exemplary IKEA Ledare GX53 LED Bulb
2. The light emitting device of claim 1, wherein the electrode portion cross section comprises a sloping surface. 3. The light emitting device of claim 1, wherein the electrode portion cross section and the central area are not coplanar. 4. The light emitting device of claim 1, wherein the housing cross section or the electrode portion cross section comprises a curved surface. 5. The light emitting device of claim 1, wherein the housing cross section comprises a rounded corner. 6. The light emitting device of claim 1, wherein the housing cross section and the electrode portion cross section form a continuous convex curved surface.	The IKEA Ledare GX53 LED Bulb uses a light emitting device including the feature disclosed in Claims 2-6. For example, the exemplary IKEA Ledare GX53 LED Bulb as shown: 

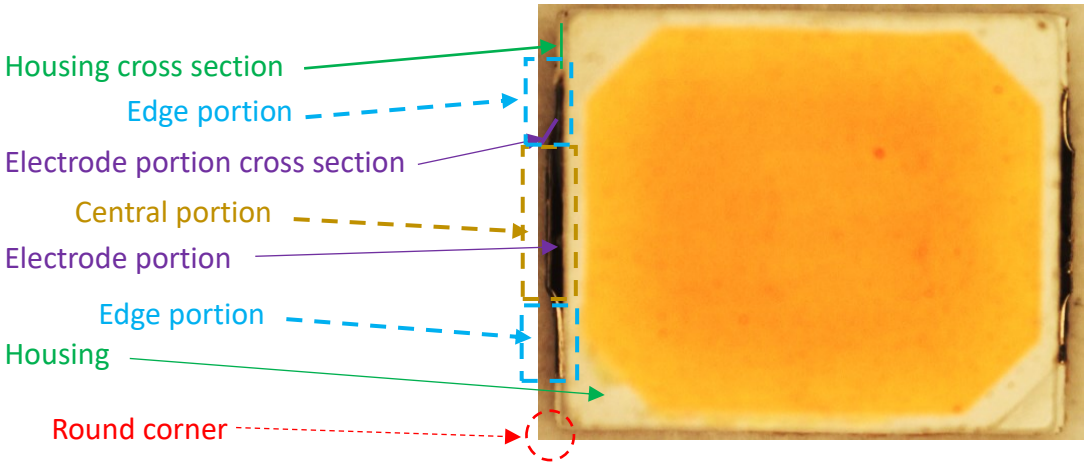
Infringement of Claims 1-6 of U.S. Patent No. 9,640,733 by IKEA Ledare 8.9W E26









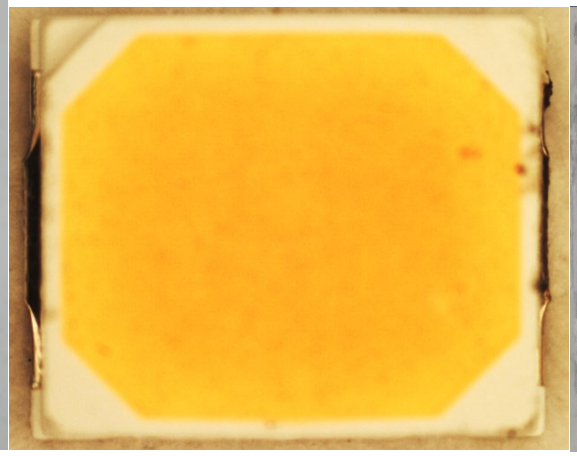


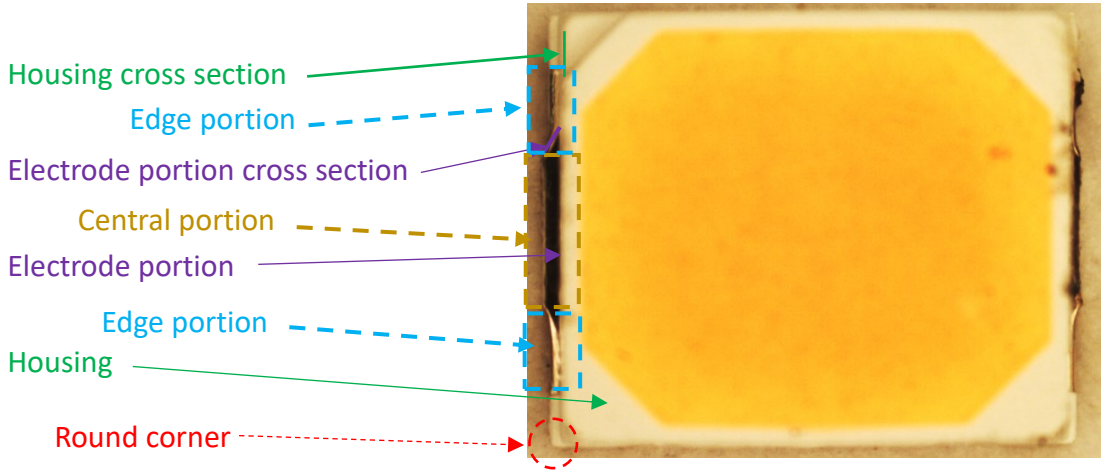
Infringement of Claims 1-6 of U.S. Patent No. 9,640,733 by IKEA Ryet LED bulb G4 100 lumen, opal, 2700 K





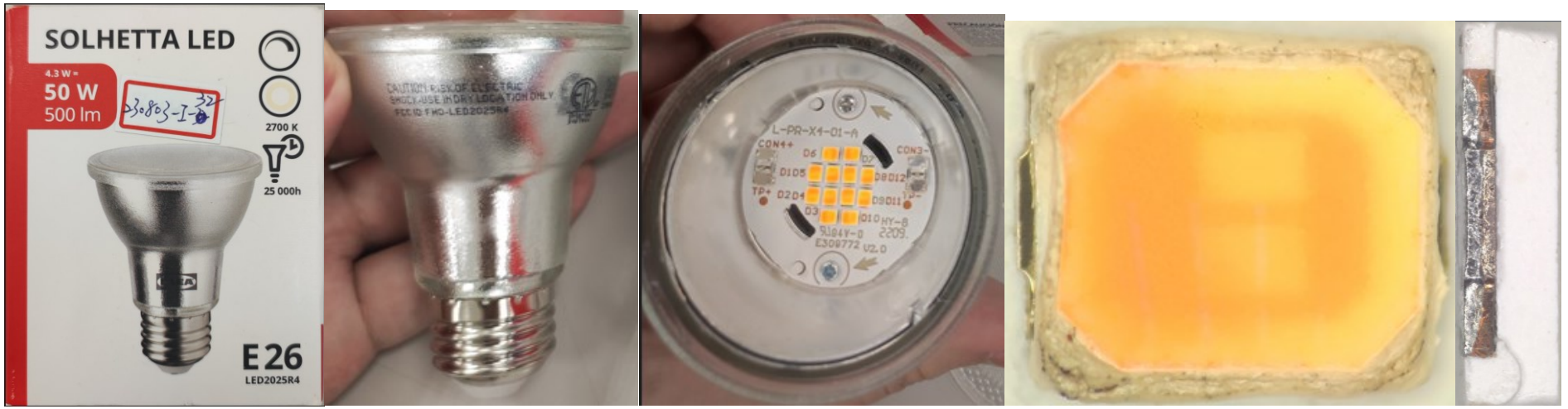


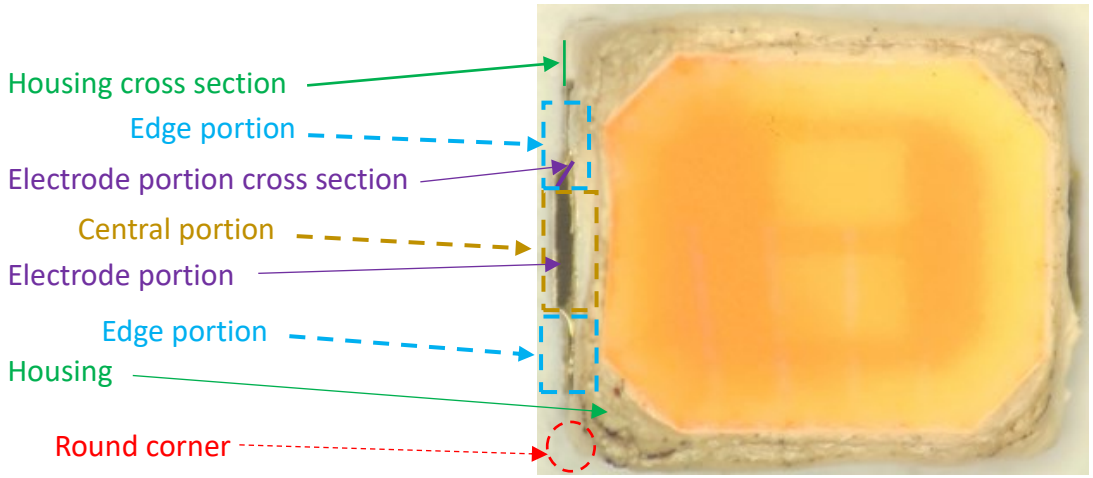




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Infringement of Claims 1-6 of U.S. Patent No. 9,640,733 by IKEA SOLHETTA LED bulb PAR20 E26 500 lumen, dimmable, 2700 K



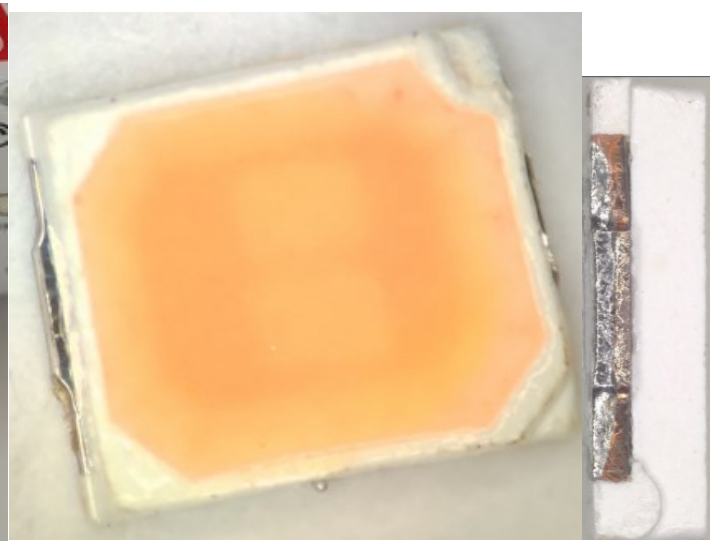


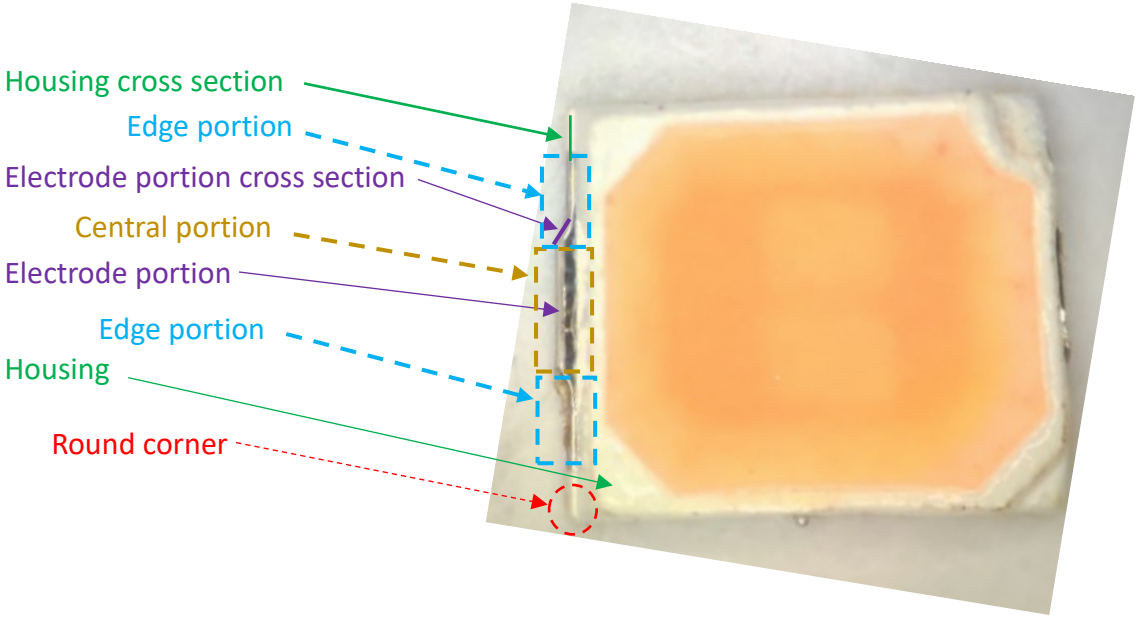
Infringement of Claims 1-6 of U.S. Patent No. 9,640,733 by IKEA SOLHETTALED bulb GU10 380 lumen, dimmable



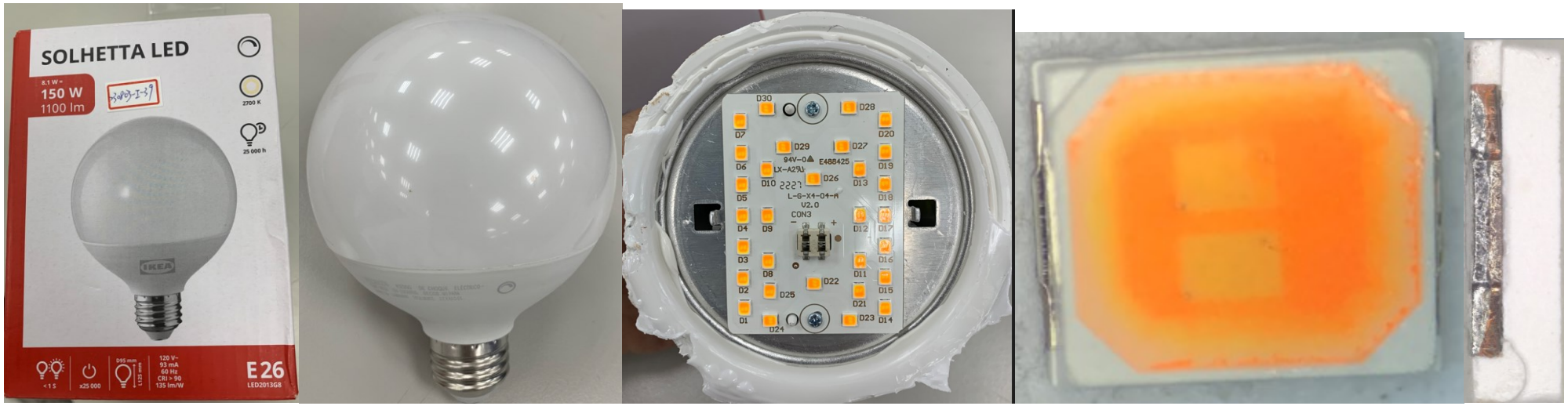


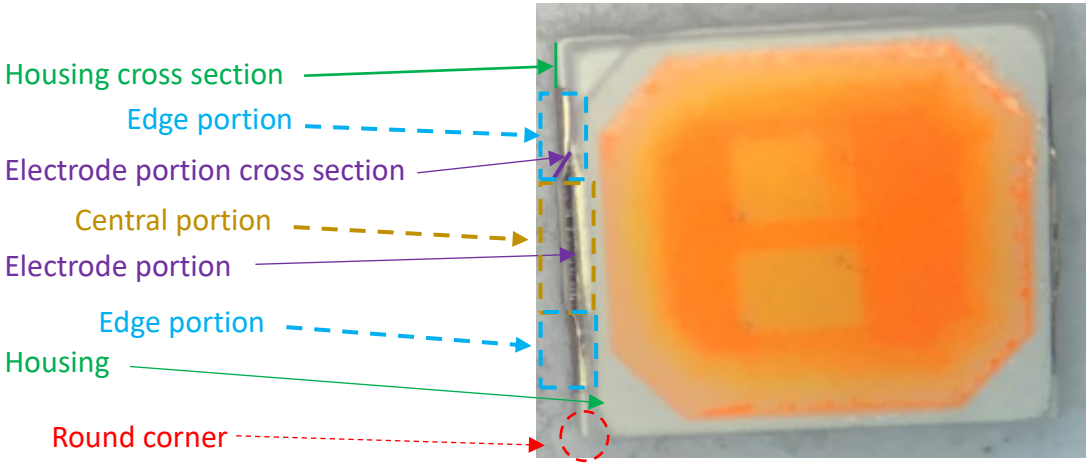




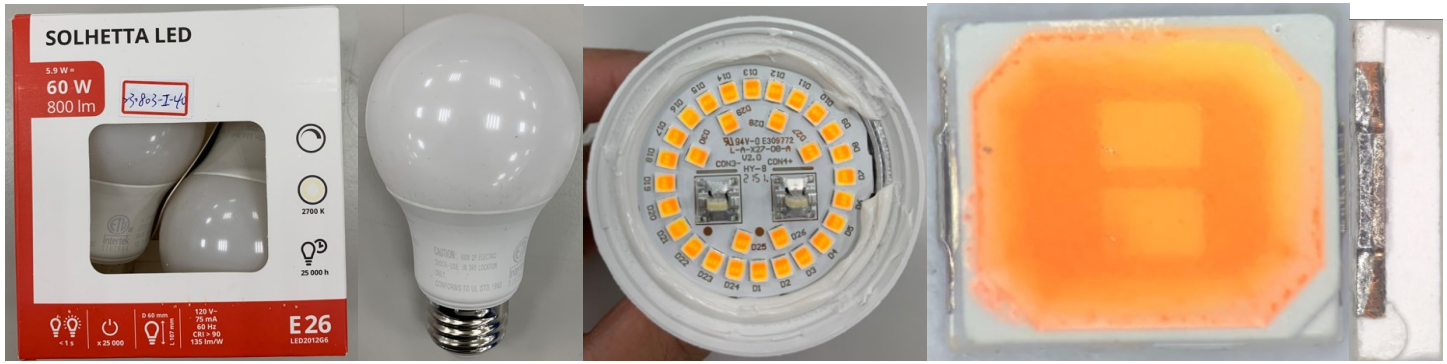


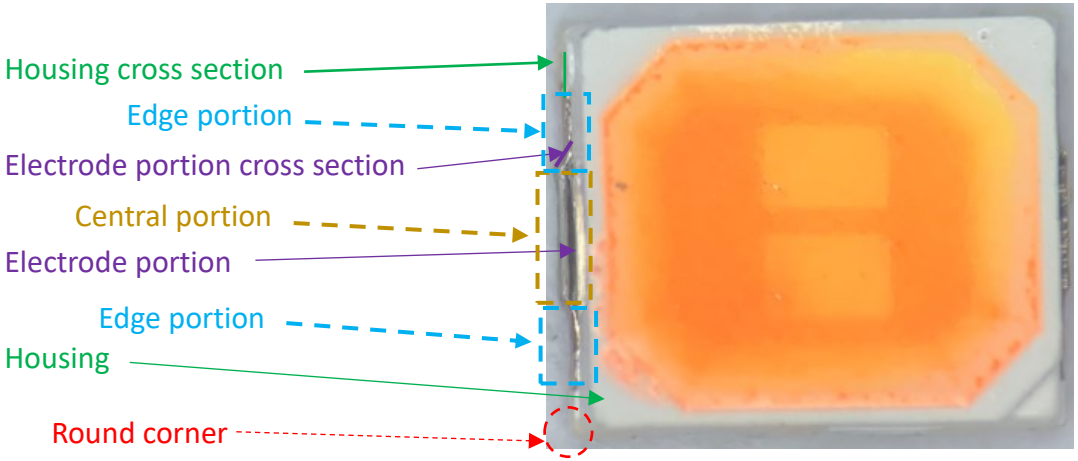
Infringement of Claims 1-6 of U.S. Patent No. 9,640,733 by IKEA SOLHETTALED bulb E26 1100 lumen, dimmable/globe opal, 4 "



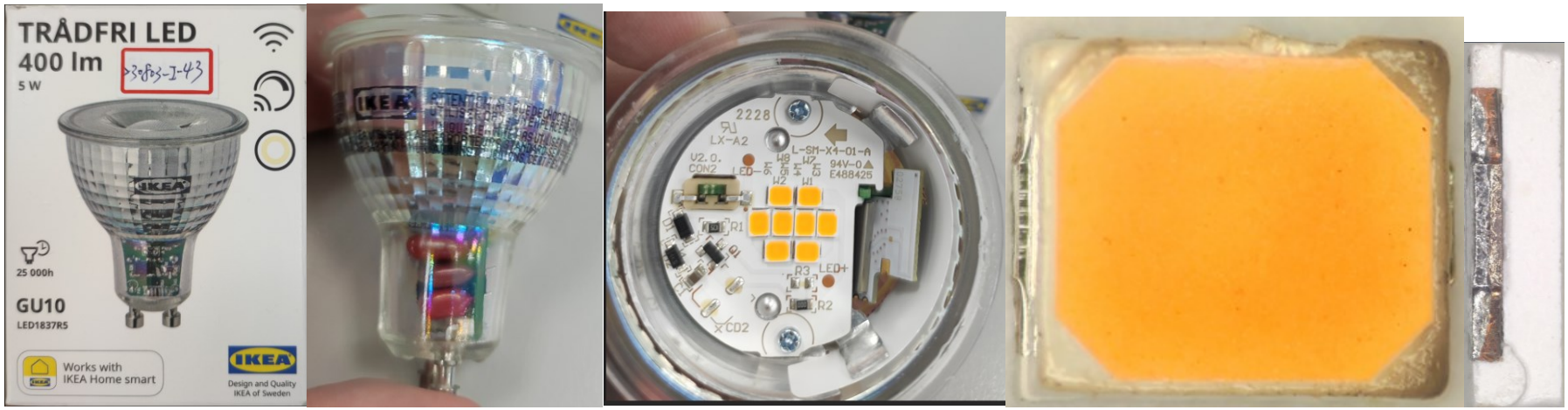


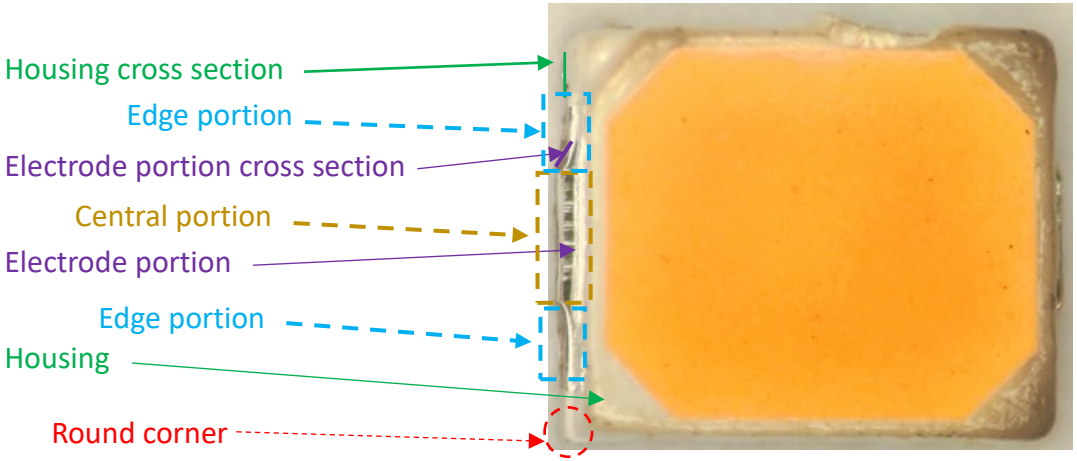
Infringement of Claims 1-6 of U.S. Patent No. 9,640,733 by IKEA SOLHETTA LED bulb E26 800 lumen, dimmable/globe opal





Infringement of Claims 1-6 of U.S. Patent No. 9,640,733 by IKEA TRÅDFRI LED bulb GU10 400 lumen, smart wireless dimmable/warm white





Infringement of Claims 1-6 of U.S. Patent No. 9,640,733 by IKEA TRÅDFRILED bulb E26 800 lumen, smart wireless dimmable/color and white spectrum globe



