

**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
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**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 SOLHETTA LED 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

dimnable/white spectrum tube-shaped

IKEA TRÅDFRI LED bulb PAR38 E26 900 lumen, smart wireless

dimnable/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

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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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 A

Infringement of U.S. Patent No. 9,905,742

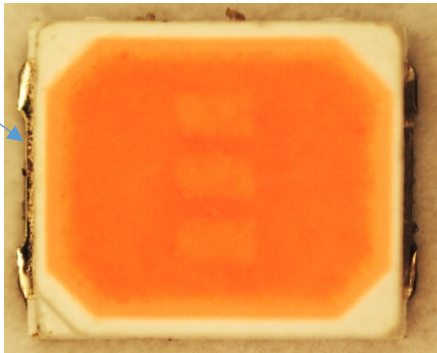
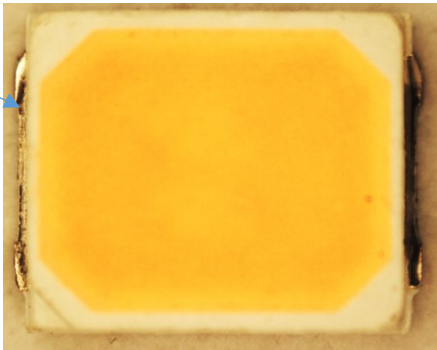
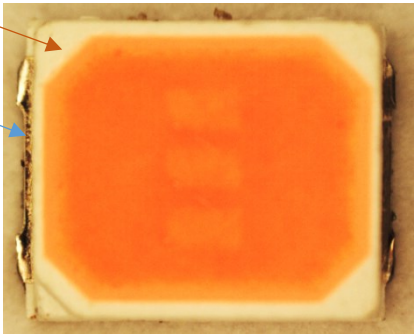
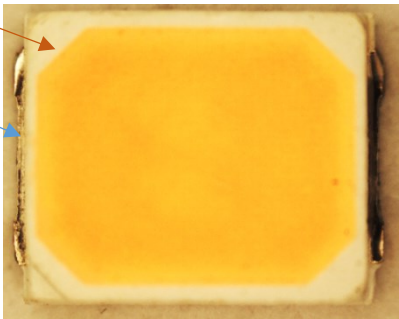
Everlight Electronics Co., Ltd. (“Everlight”) is accusing the following products manufactured, used, sold, and/or offered for sale in the United States, or imported into the United States, in the time period ranging from six years prior to the filing of Everlight’s complaint to present (the “’742 Accused Products”) of infringing claims 1-2, 5-12, 15, and 20-21 (the “’742 Asserted Claims”) of U.S. Pat. No. 9,905,742 (the “’742 Patent”).

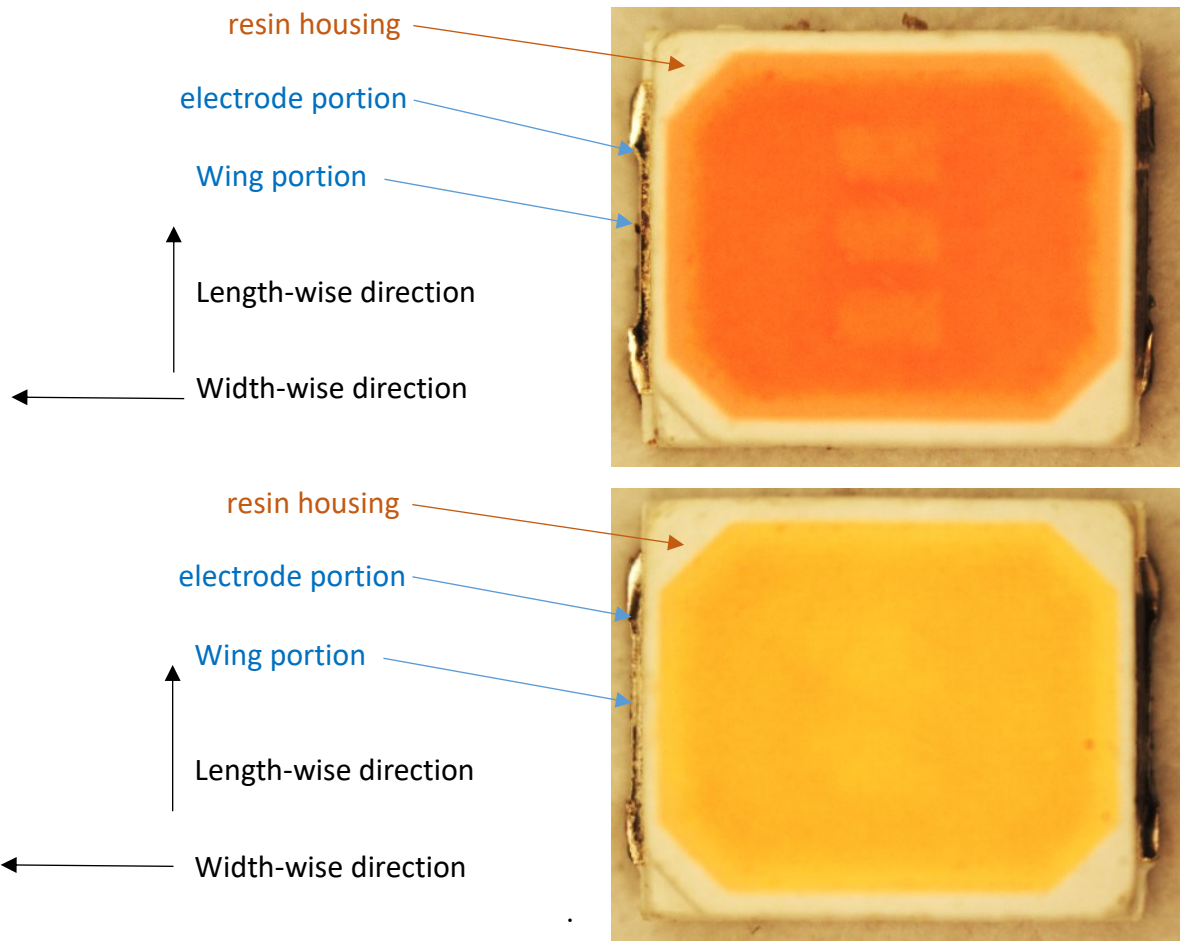
‘742 Accused Products
IKEA Ledare 5.5W E26
IKEA SOLHETTA LED bulb E12 450 lumen, globe opal
IKEA TRÅDFRI LED bulb E26 806 lumen, smart wireless dimmable/warm white globe
IKEA TRÅDFRI LED bulb E12 450 lumen, smart wireless dimmable/white spectrum globe
IKEA SOLHETTA LED bulb E12 250 lumen, chandelier/opal
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

The detailed claim chart for the representative example set forth below is representative of, and applies to, all '742 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 '742 Accused Products, including between the representative example and the represented products, are not material to infringement of the '742 Asserted Claims, including for example, the number of LED chips, circuit board shape, emission wavelength of the LED chip and LED size.

Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA Ledare 5.5W E26

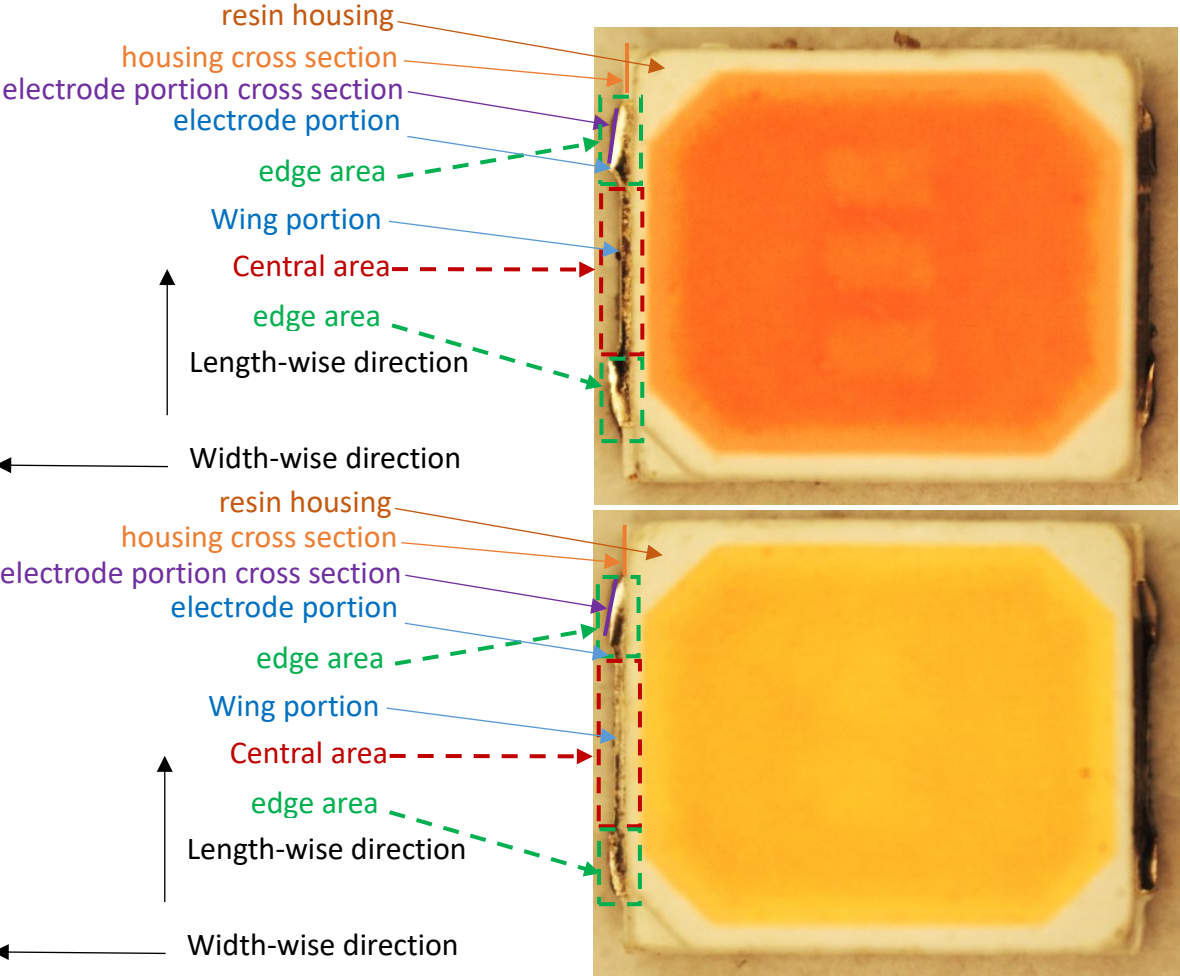
U.S. Patent No. 9,905,742	Exemplary IKEA Ledare 5.5W E26
1. A light emitting device, comprising:	The IKEA Ledare 5.5W E26 uses a light emitting device. For example, the exemplary IKEA Ledare 5.5W E26 comprises light emitting devices:
1a) at least one electrode portion; and	The IKEA Ledare 5.5W E26 uses a light emitting device comprising at least one electrode portion. One example of these elements within the IKEA Ledare 5.5W E26 is shown below:

	electrode portion  electrode portion 
1b) a resin housing containing a reflecting material and covering a portion of said at least one electrode portion,	The IKEA Ledare 5.5W E26 uses a light emitting device comprising a resin housing containing a reflecting material and covering a portion of said at least one electrode portion. One example of these elements within the IKEA Ledare 5.5W E26 is shown below: resin housing electrode portion  resin housing electrode portion 
1c) wherein said at least one electrode portion comprises a wing portion which is exposed outside the housing, the wing portion extending in a length-wise direction of the wing portion along an edge of the housing and protruding from the housing in a width-wise direction of the wing portion, the length-wise direction being	The IKEA Ledare 5.5W E26 uses a light emitting device comprising the at least one electrode portion including a wing portion which is exposed outside the housing. The wing portion extends in a length-wise direction of the wing portion along an edge of the housing and protruding from the housing in a width-wise direction of the wing portion. The length-wise direction is substantially perpendicular to the width-wise direction. One example of these elements within the IKEA Ledare 5.5W E26 is shown below:

substantially perpendicular to the width-wise direction,	 resin housing electrode portion Wing portion Length-wise direction Width-wise direction resin housing electrode portion Wing portion Length-wise direction Width-wise direction
1d) wherein the wing portion comprises: - a central area; and - at least one edge area having a length in the length-wise direction shorter than that of the central area, and - wherein the at least one edge area	The IKEA Ledare 5.5W E26 uses a light emitting device comprising the wing portion including a central area and at least one edge area having a length in the length-wise direction shorter than that of the central area. The at least one edge area protrudes in the width-wise direction from an end portion of the central area. The at least one electrode portion further comprises an electrode portion cross section. One example of these elements within the IKEA Ledare 5.5W E26 is shown below:

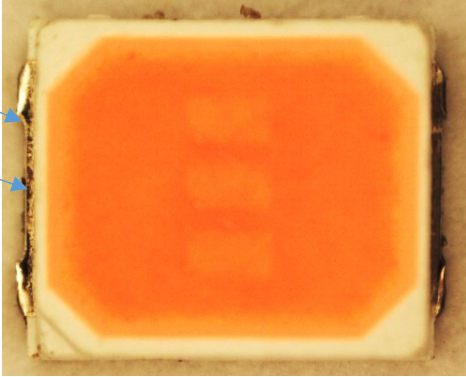
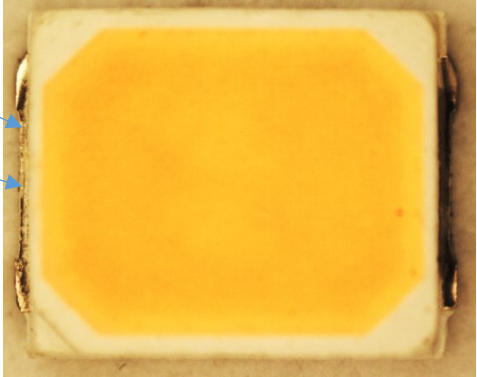
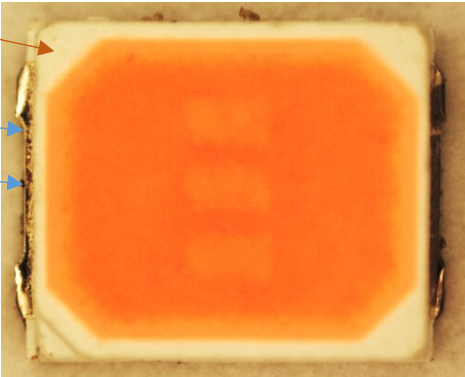
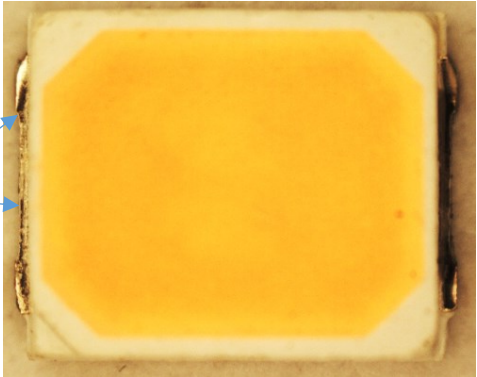
protrudes in the width-wise direction from an end portion of the central area, wherein the at least one electrode portion further comprises an electrode portion cross section,	The figure consists of two photographs of a light emitting device, one with an orange resin housing (top) and one with a yellow resin housing (bottom). Both devices have a central area, wing portions, and edge areas. Technical annotations with arrows point to various parts: 'resin housing' (orange), 'electrode portion cross section' (purple), 'electrode portion' (blue), 'edge area' (green), 'Wing portion' (blue), 'Central area' (red), 'Length-wise direction' (green dashed arrow), and 'Width-wise direction' (black solid arrow).
1f) wherein the resin housing comprises at least one housing cross section, wherein the at least one housing cross section is located in a vicinity of four corners of the resin housing, and wherein the at least one housing cross	The IKEA Ledare 5.5W E26 uses a light emitting device comprising the resin housing including at least one housing cross section. The at least one housing cross section is located in a vicinity of four corners of the resin housing. The at least one housing cross section is not level with the electrode portion cross section. One example of these elements within the IKEA Ledare 5.5W E26 is shown below:

section is not level with the electrode portion cross section.

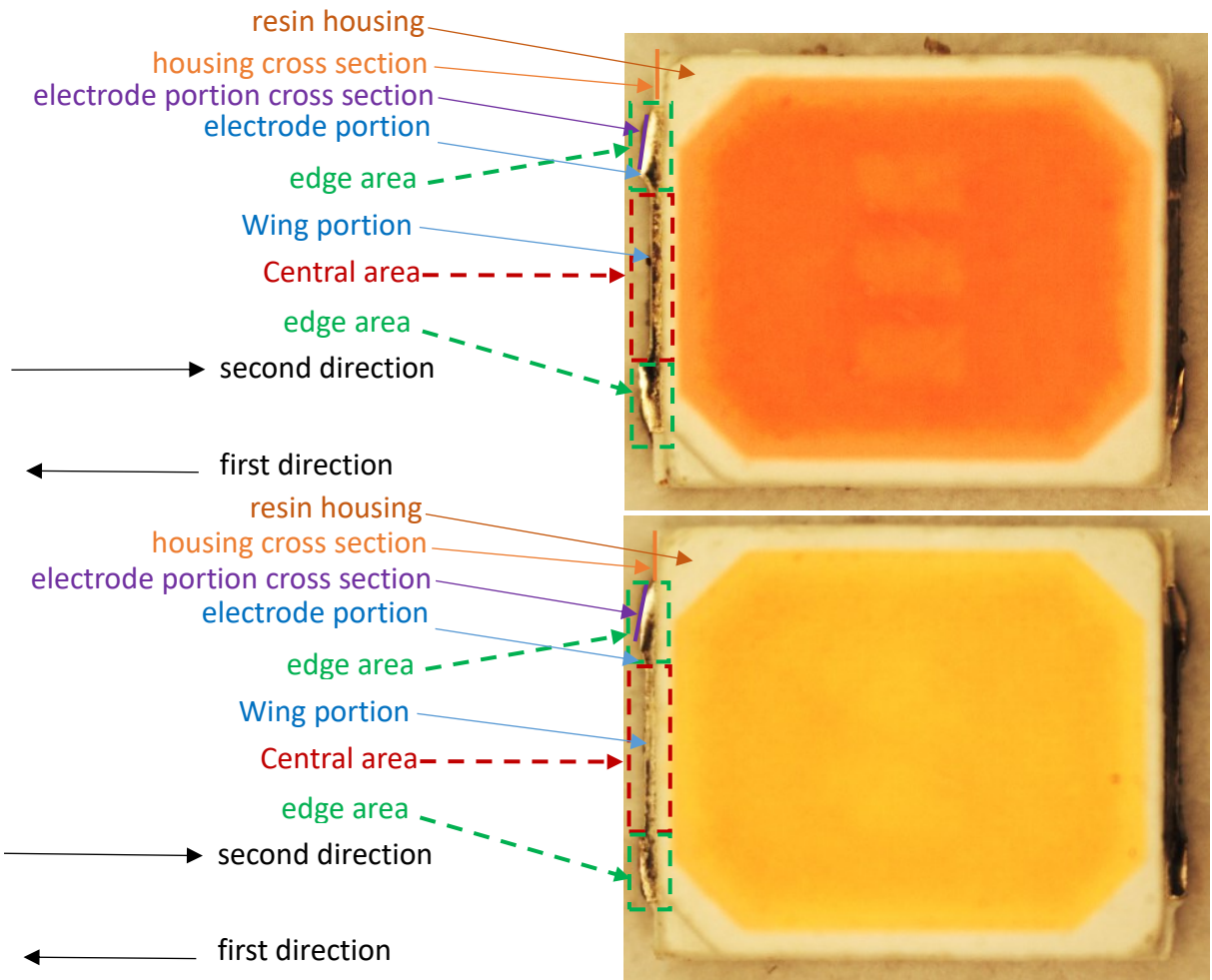


least a portion of an outer surface of the wing portion. 10. The light emitting device according to claim 9, wherein the electrode portion cross section extends in a thickness direction of the at least one electrode portion.	
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U.S. Patent No. 9,905,742	Exemplary IKEA Ledare 5.5W E26
11. A light emitting device, comprising:	The IKEA Ledare 5.5W E26 uses a light emitting device. For example, the exemplary IKEA Ledare 5.5W E26 comprises light emitting devices: 
11a) at least one electrode portion having a wing portion; and	The IKEA Ledare 5.5W E26 uses a light emitting device comprising at least one electrode portion having a wing portion. One example of these elements within the IKEA Ledare 5.5W E26 is shown below:

	electrode portion wing portion  electrode portion wing portion 
11b) a resin housing containing a reflecting material,	The IKEA Ledare 5.5W E26 uses a light emitting device comprising a resin housing containing a reflecting material. One example of these elements within the IKEA Ledare 5.5W E26 is shown below: resin housing  electrode portion wing portion resin housing  electrode portion wing portion
11c) wherein the wing portion comprises: a central area protruding from the housing in a first direction away from the housing; and at least one edge area protruding from an edge portion of the central area, in the first direction,	The IKEA Ledare 5.5W E26 uses a light emitting device comprising the wing portion comprising a central area protruding from the housing in a first direction away from the housing; and at least one edge area protruding from an edge portion of the central area, in the first direction. One example of these elements within the IKEA Ledare 5.5W E26 is shown below:

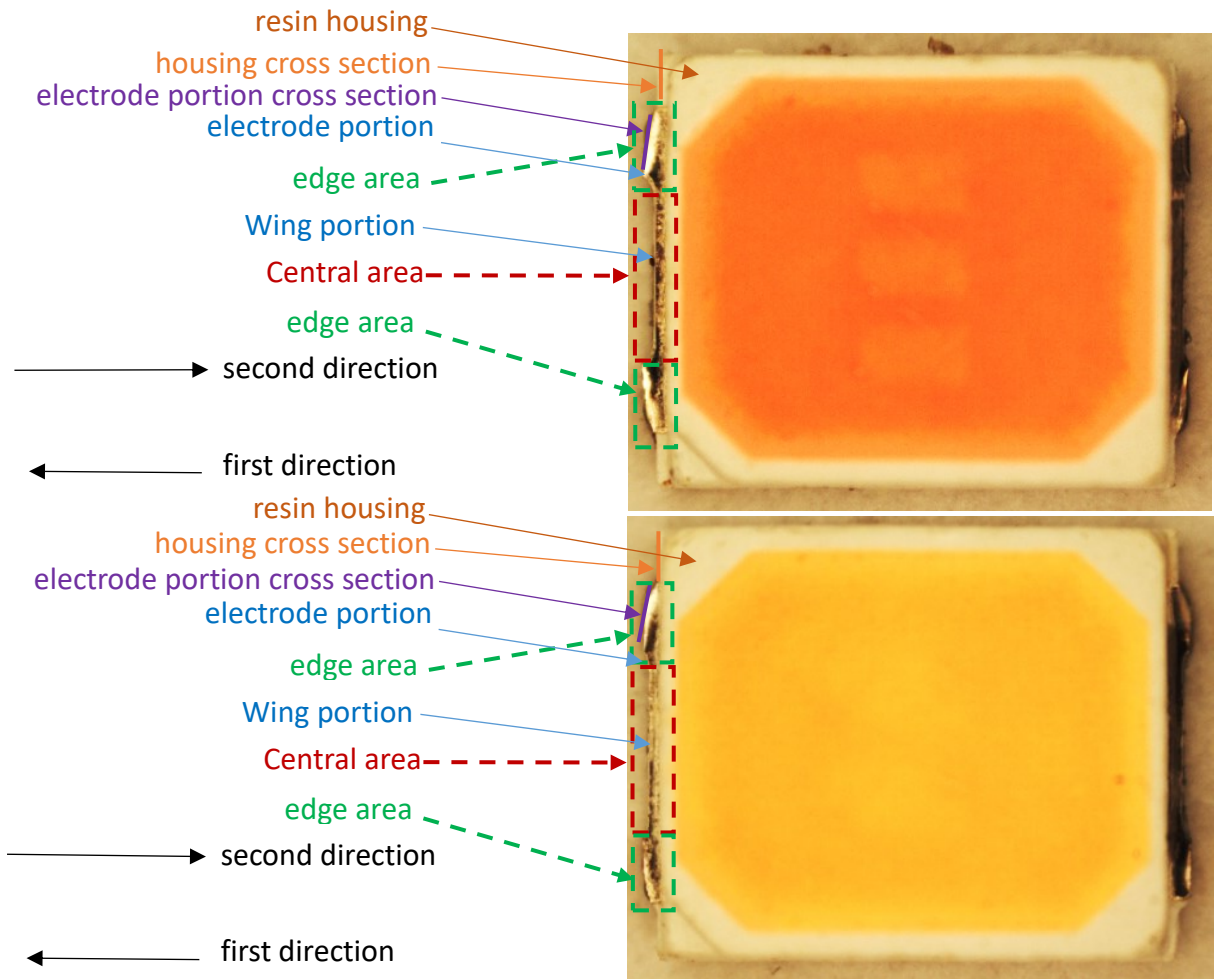
11d)wherein the central area is recessed from the at least one edge area in a second direction opposite from the first direction toward the housing, wherein the at least one electrode portion further comprises an electrode portion cross section, wherein the resin housing comprises at least one housing cross section, wherein the at least one housing cross section is located in a vicinity of a comer of the resin housing, and	The IKEA Ledare 5.5W E26 uses a light emitting device comprising the central area is recessed from the at least one edge area in a second direction opposite from the first direction toward the housing, wherein the at least one electrode portion further comprises an electrode portion cross section, wherein the resin housing comprises at least one housing cross section, wherein the at least one housing cross section is located in a vicinity of a comer of the resin housing. One example of these elements within the IKEA Ledare 5.5W E26 is shown below:



11f) wherein the at least one housing cross section is not level with the electrode portion cross section, wherein the at least one edge area

The IKEA Ledare 5.5W E26 uses a light emitting device comprising the at least one housing cross section is not level with the electrode portion cross section, wherein the at least one edge area comprises two edge areas, wherein the two edge areas protrude from the central area in the first direction. One example of these elements within the IKEA Ledare 5.5W E26 is shown below:

comprises two edge areas,
wherein the two edge areas
protrude from the central area in
the first direction.



U.S. Patent No. 9,905,742

12. The light emitting device according to claim 11, wherein the wing portion is exposed outside the resin housing.

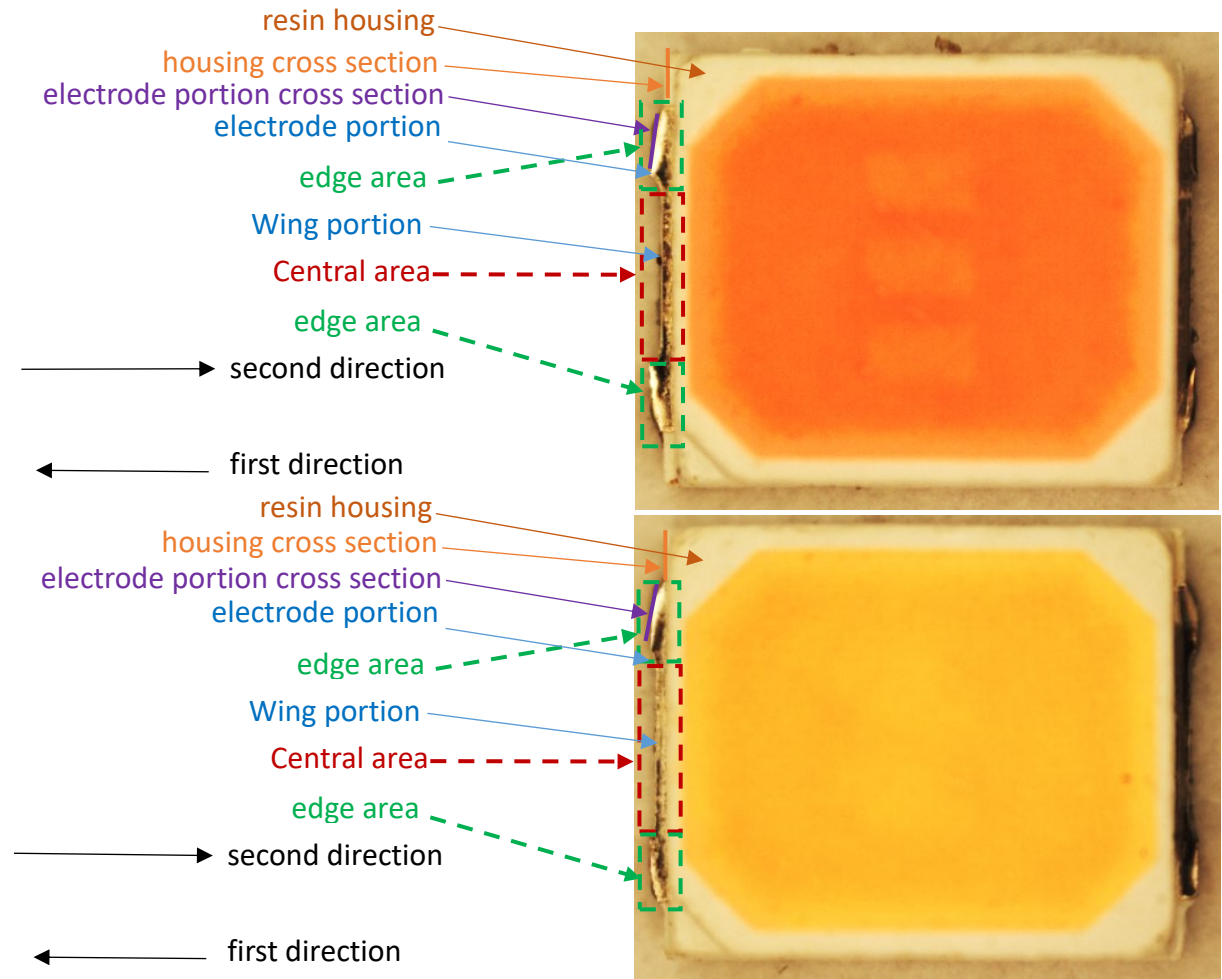
15. The light emitting device according to claim 11, wherein the at least one electrode portion cross section comprises a curved surface.

20. The light emitting device according to claim 11, wherein the central area is provided between the two edge area along a third direction substantially perpendicular to the first and second direction.

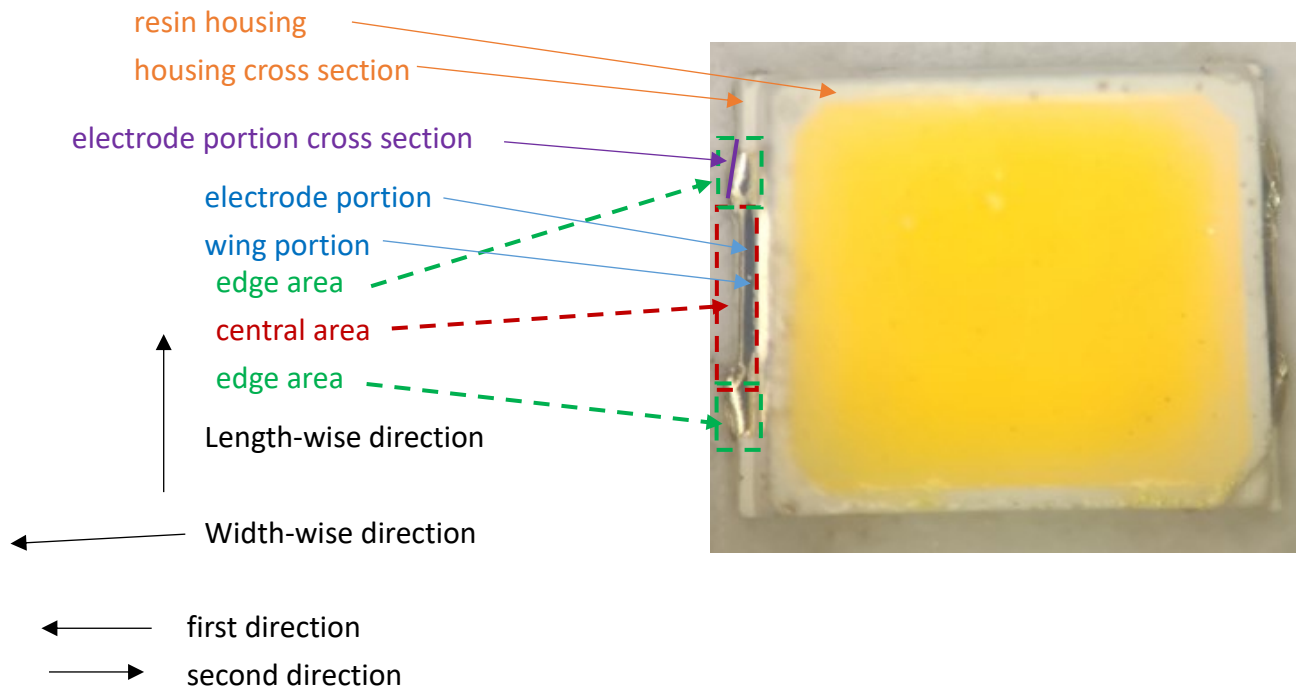
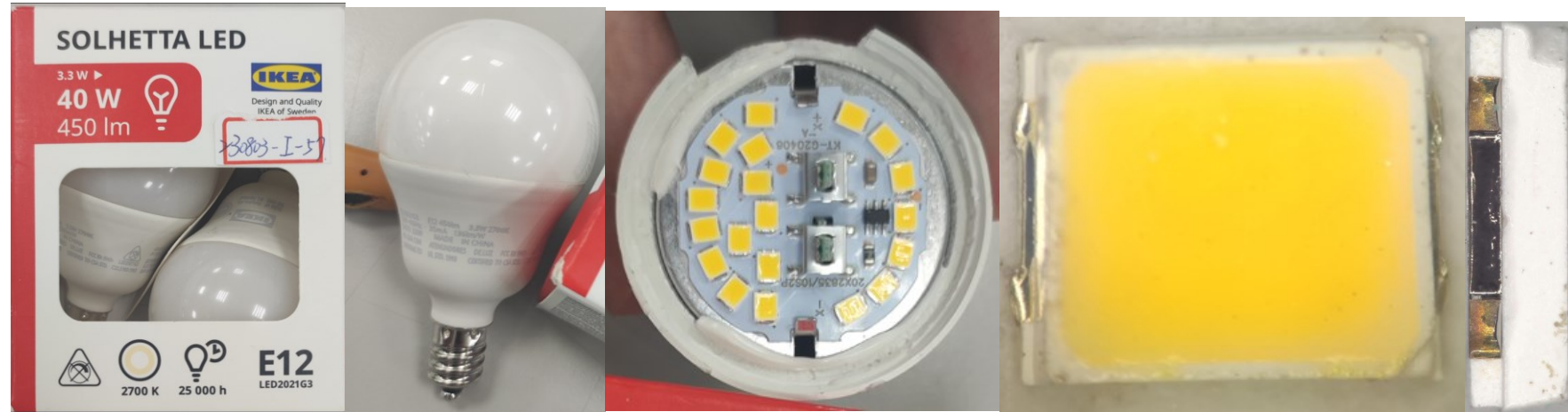
21. The light emitting device according to claim 11, wherein the electrode portion cross section corresponds to at least a portion of an outer surface of the wing portion.

Exemplary IKEA Ledare 5.5W E26

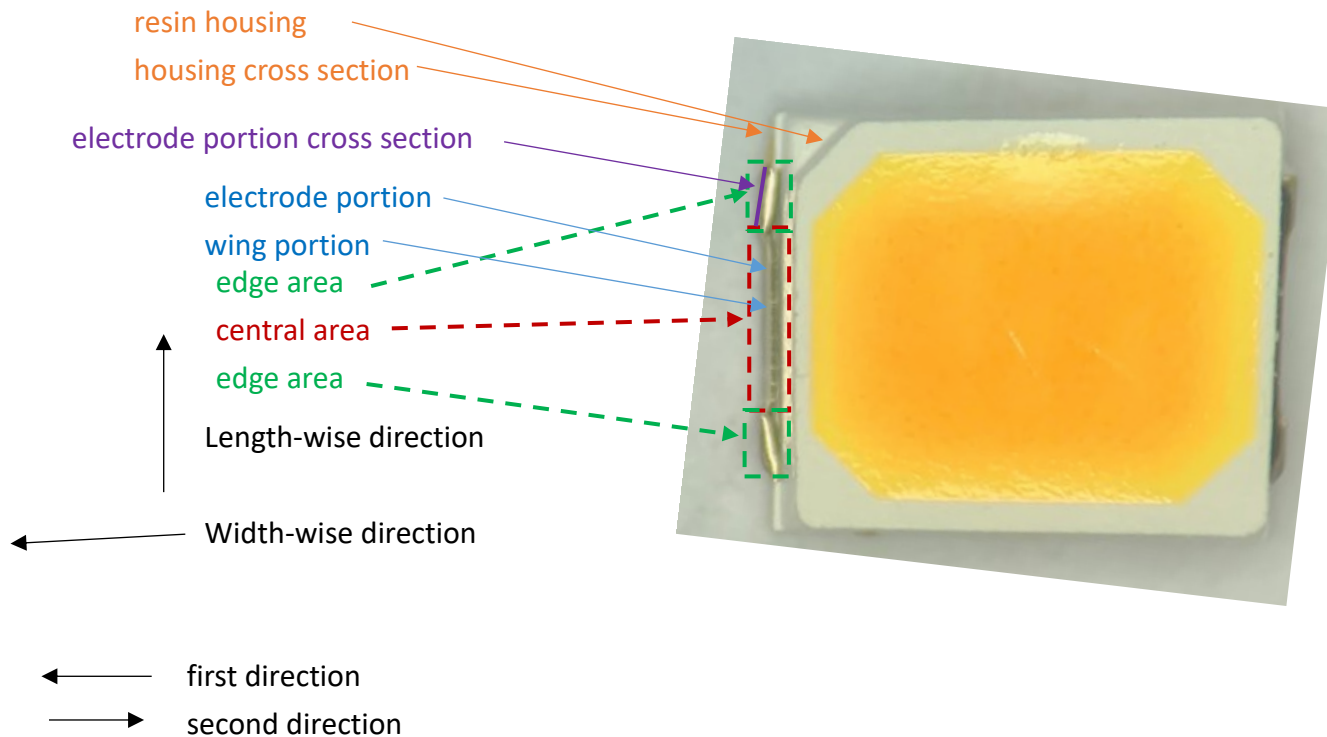
The IKEA Ledare 5.5W E26 uses a light emitting device comprising the features disclosed in the claims 12-15, and 20-21. One example of these elements within the IKEA Ledare 5.5W E26 is shown below:



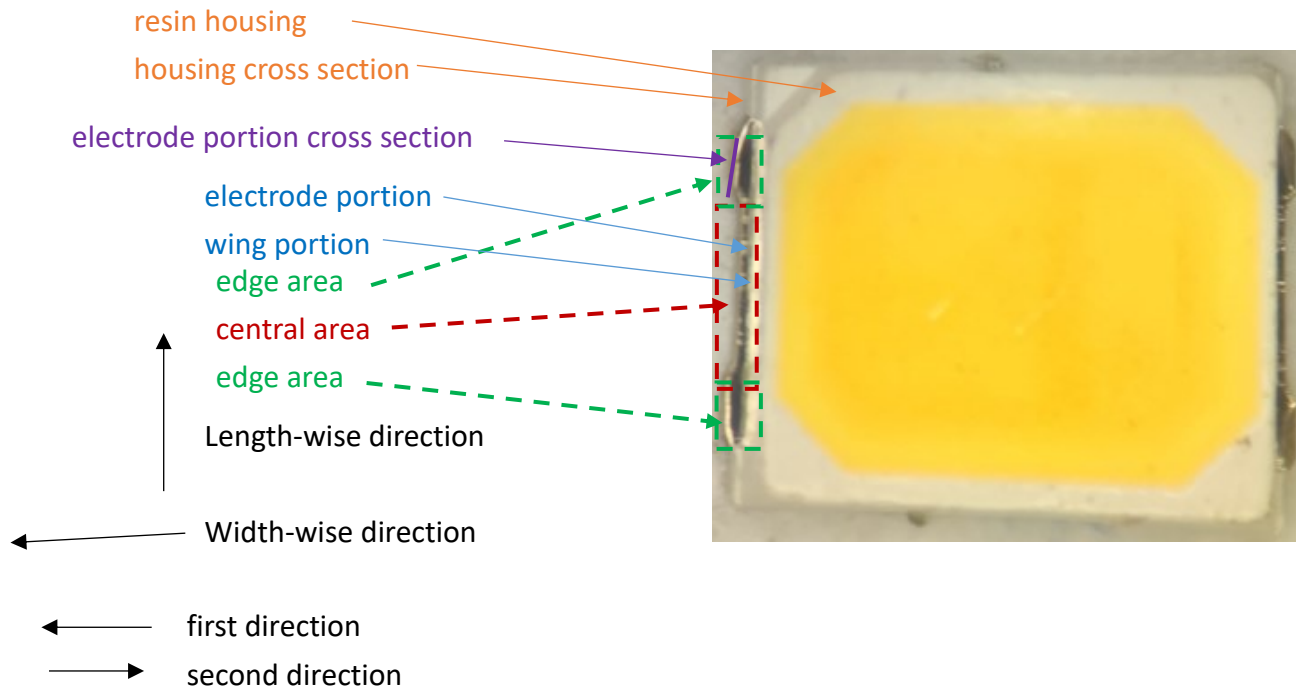
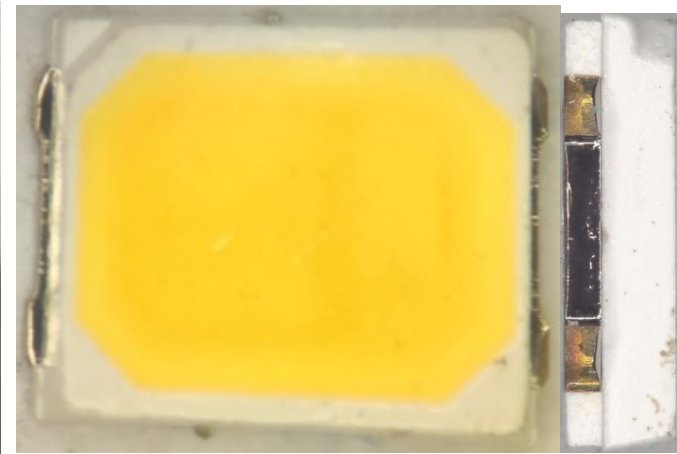
Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA SOLHETTA LED bulb E12 450 lumen, globe opal



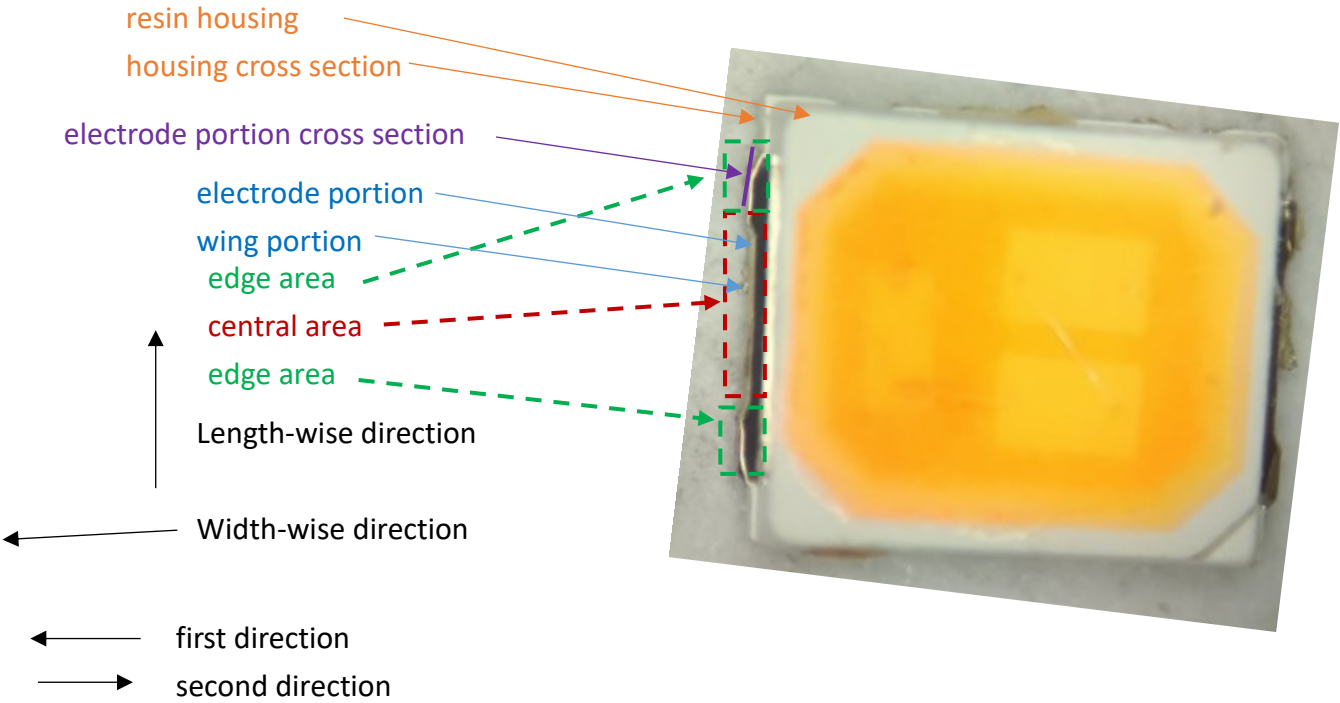
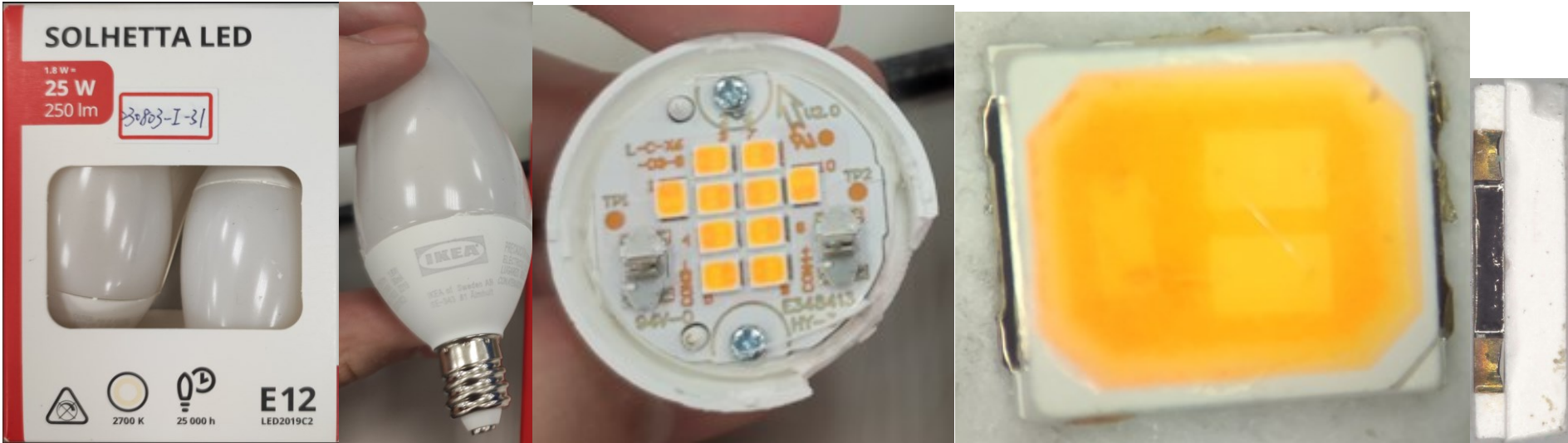
Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA TRÅDFRI LED bulb E26 806 lumen, smart wireless dimmable/warm white globe



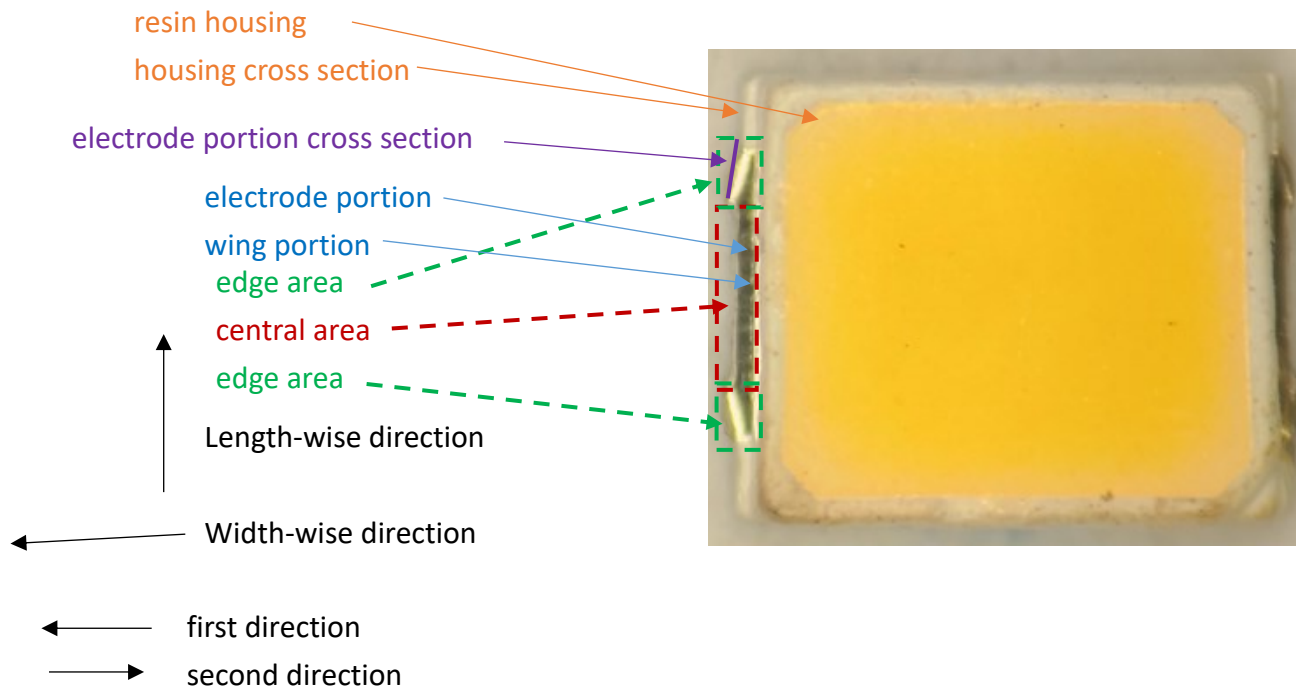
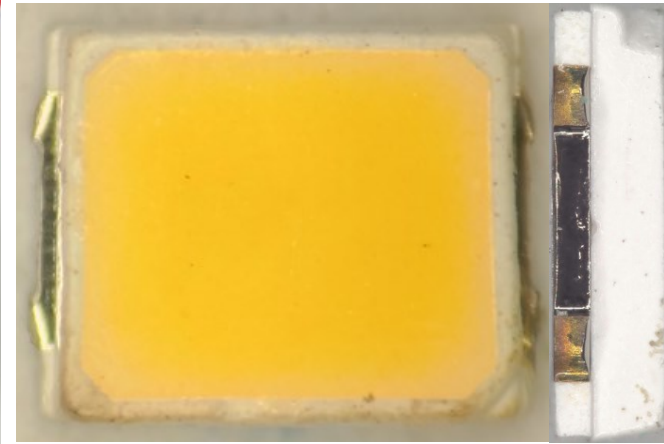
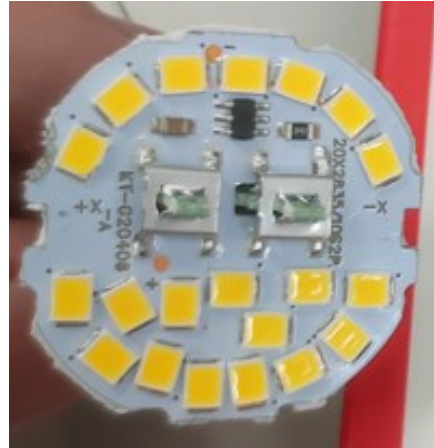
Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA TRÅDFRI LED bulb E12 450 lumen, smart wireless dimmable/white spectrum globe



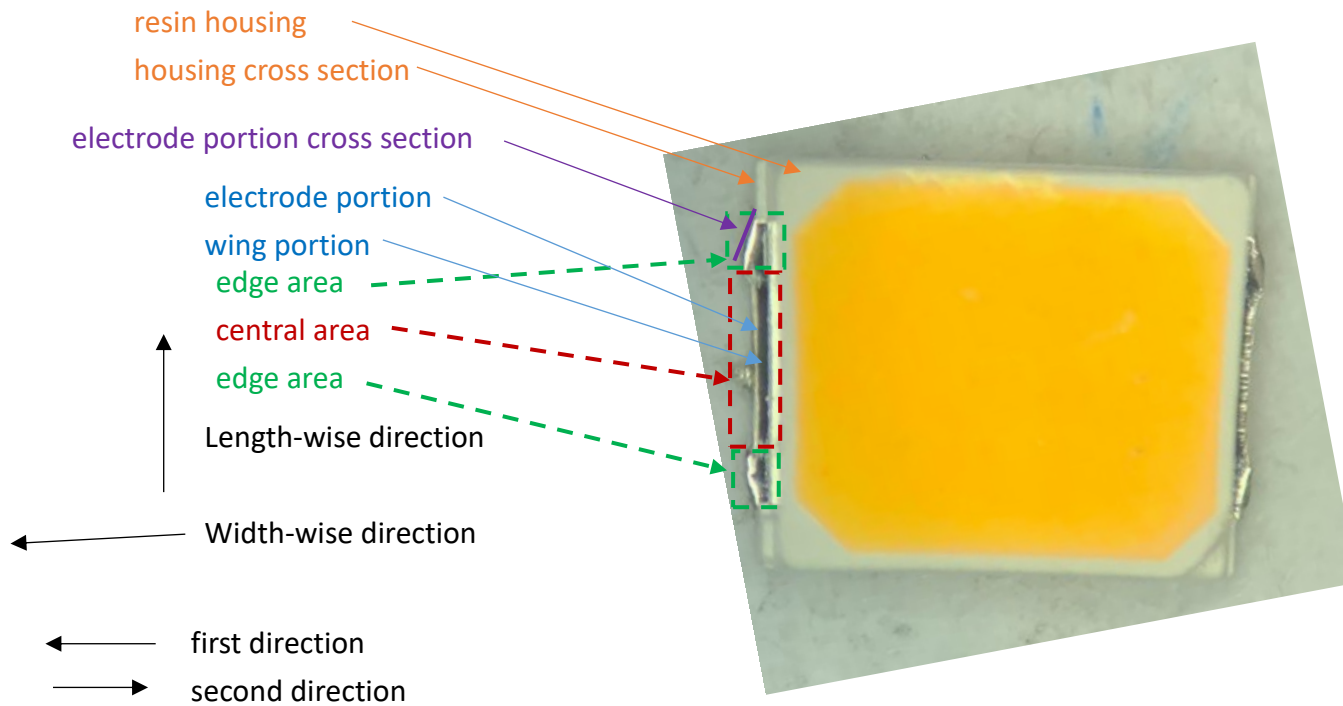
Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA SOLHETTALED bulb E12 250 lumen, chandelier/opal



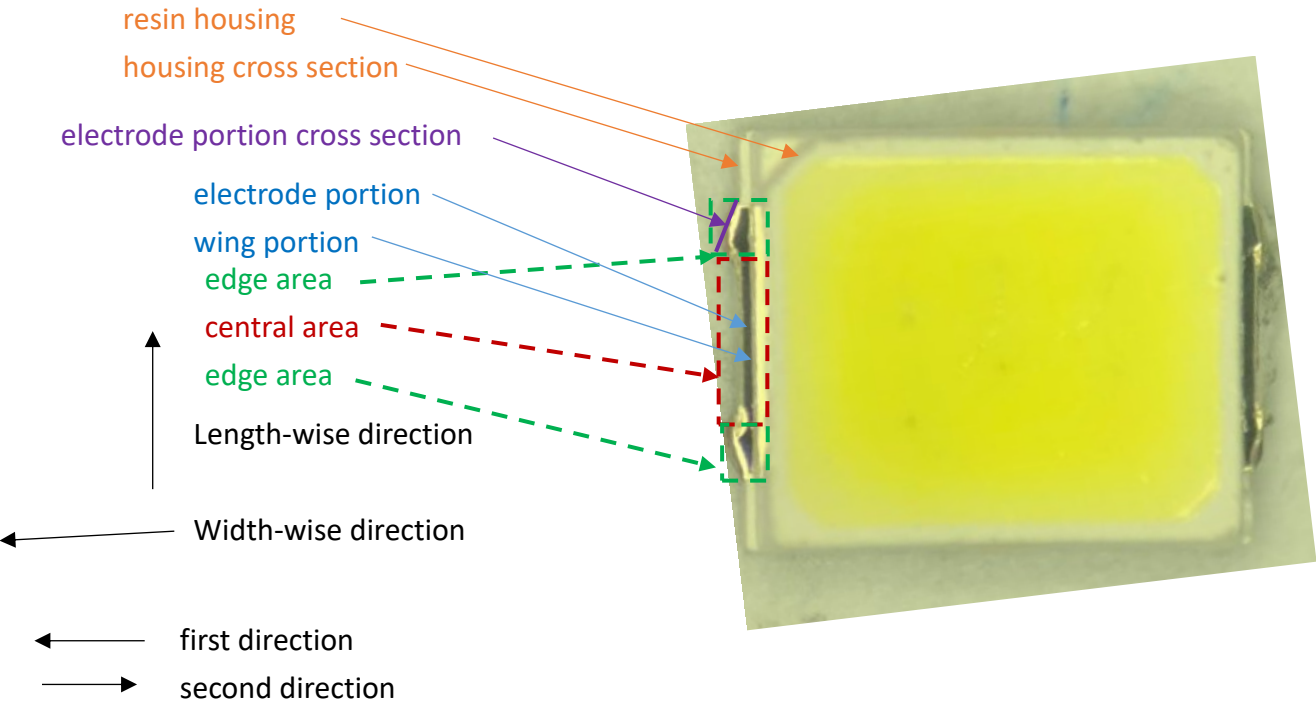
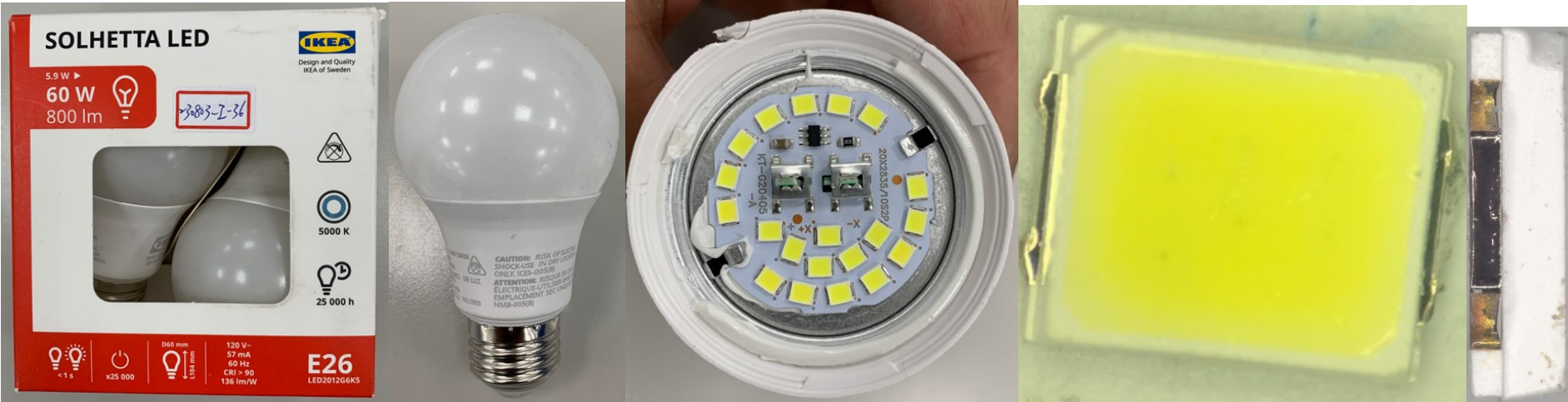
Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA SOLHETTA LED bulb E12 450 lumen, chandelier/opal



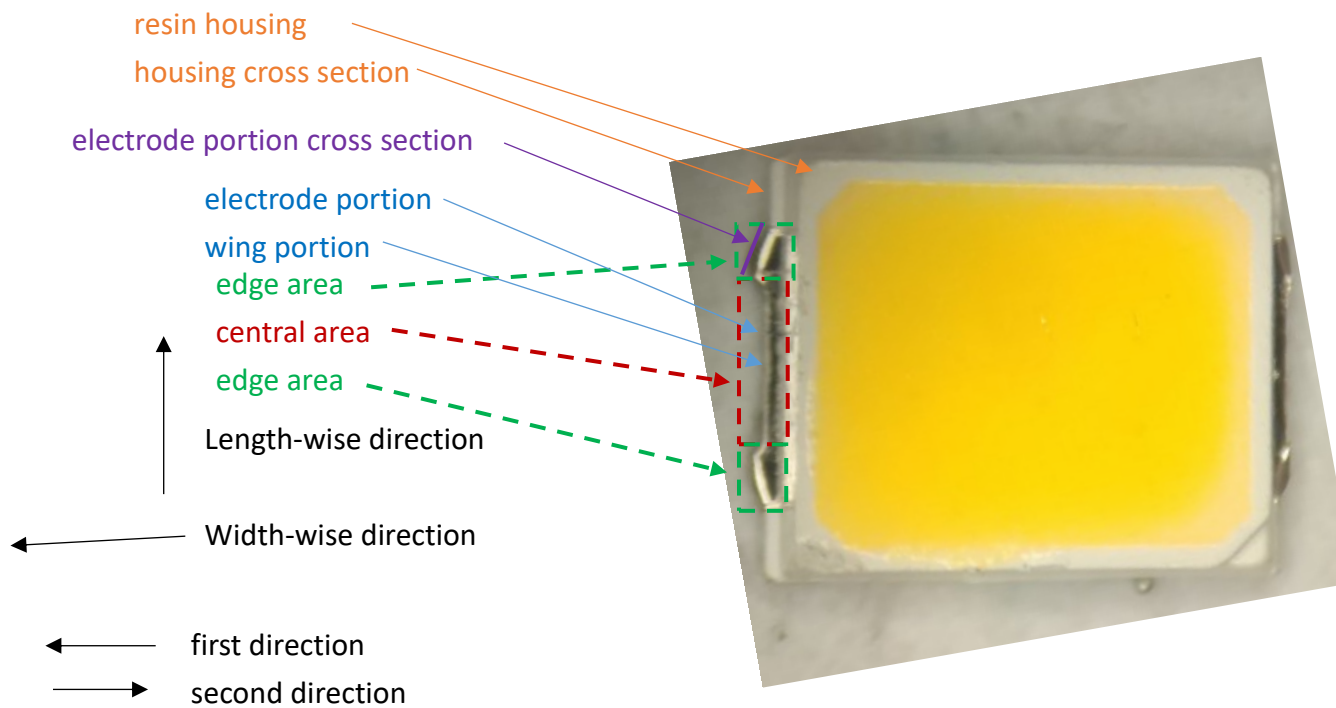
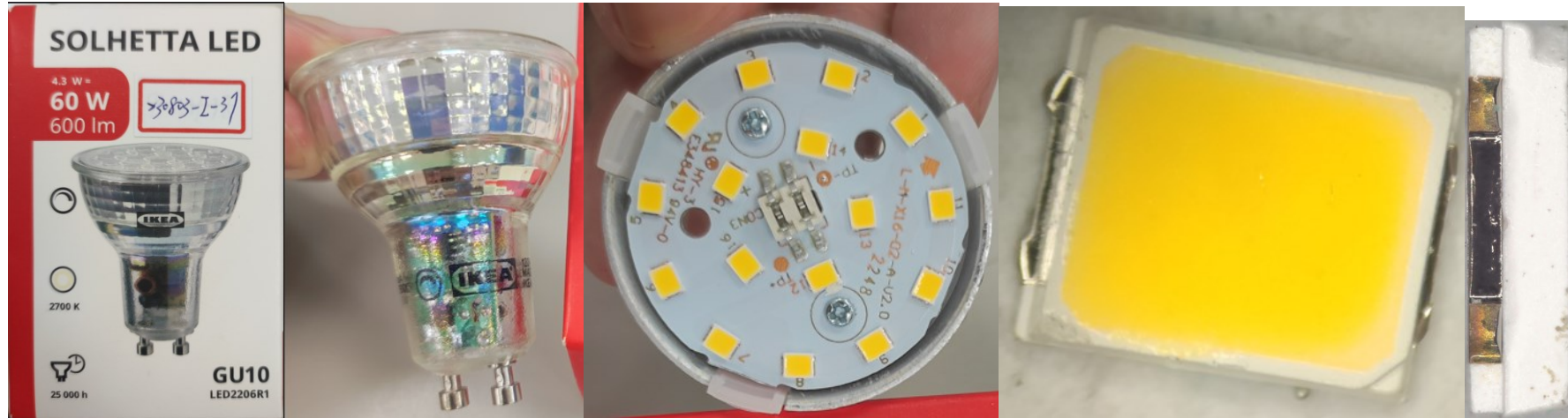
Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA SOLHETTA LED bulb E12 800 lm, dimmable/globe opal, 2 "



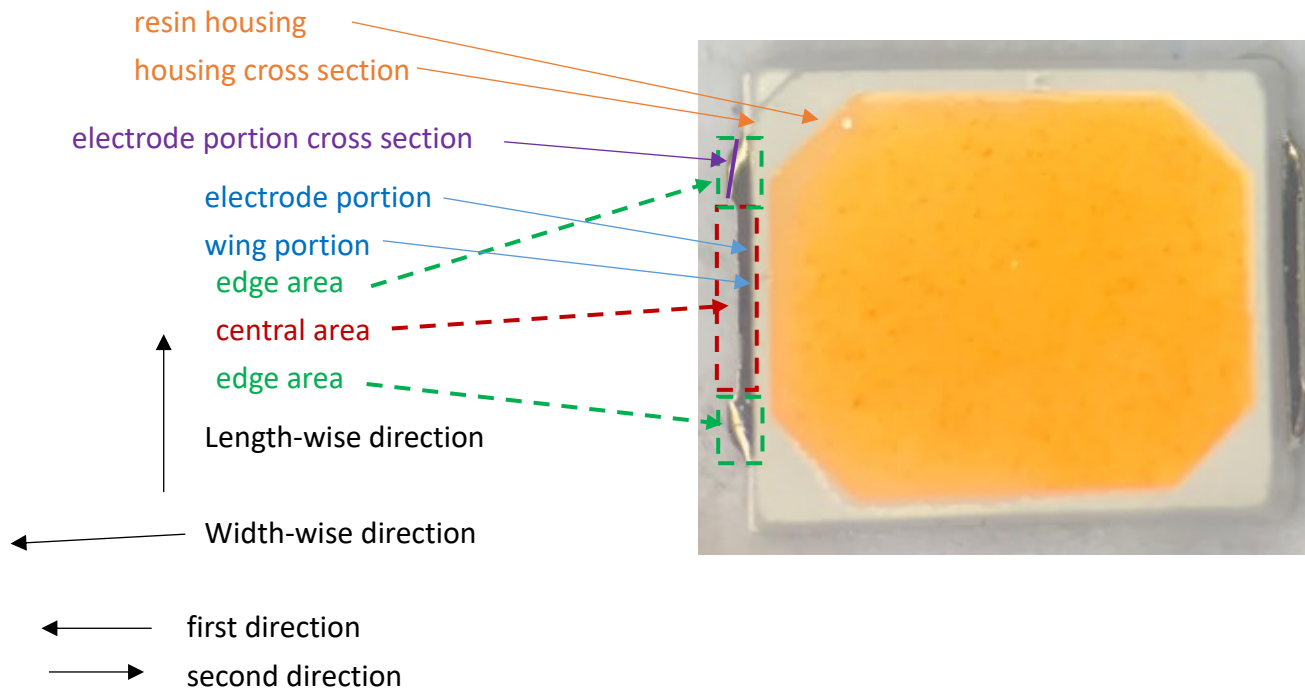
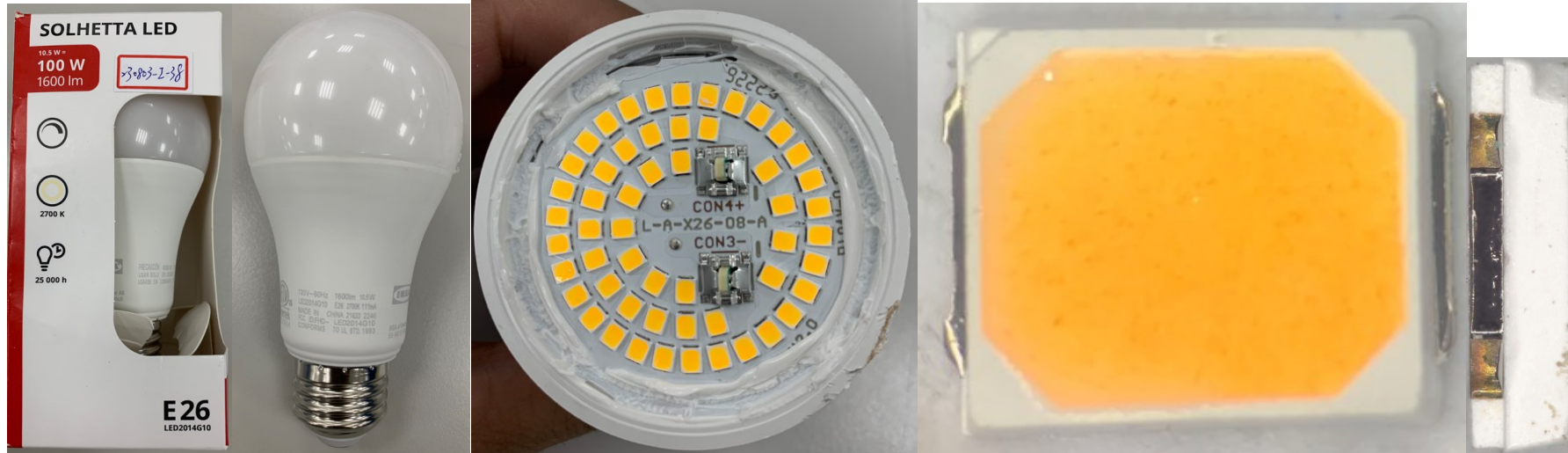
Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA SOLHETTA LED bulb E26 800 lumen, globe opal, 5000 K



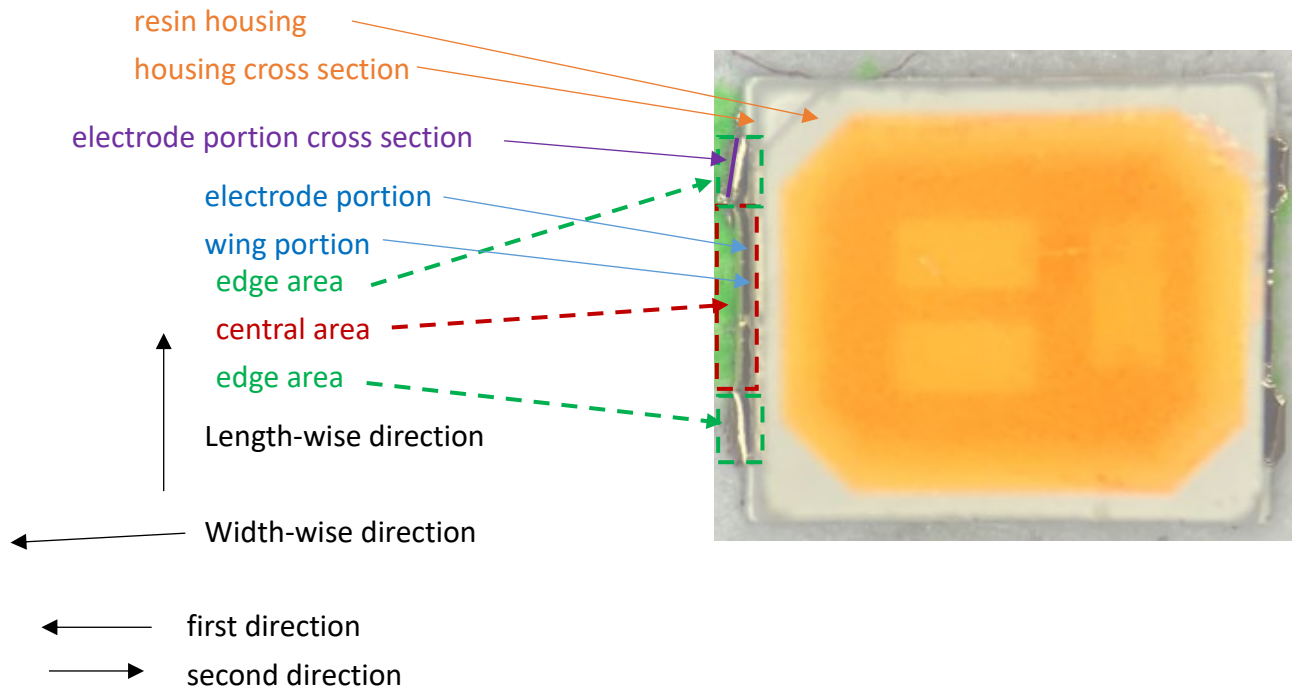
Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA SOLHETTA LED bulb GU10 600 lumen, dimmable



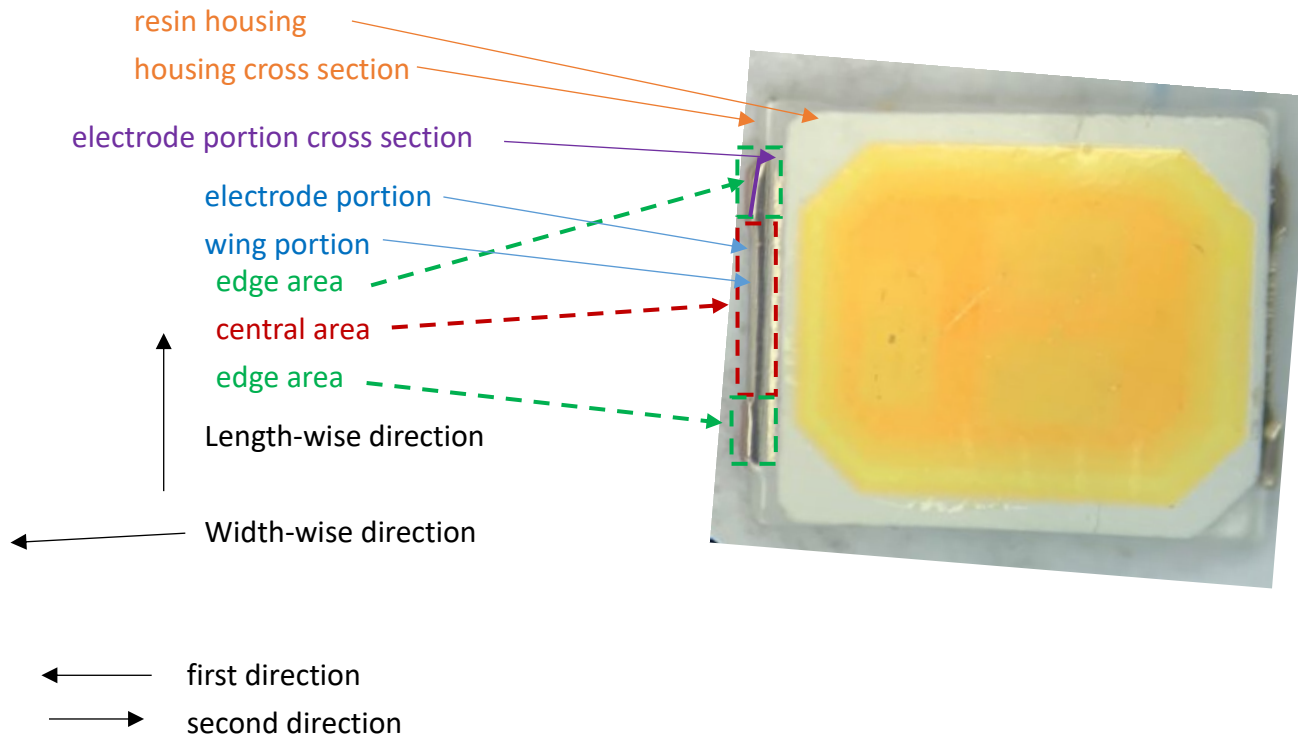
Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA SOLHETTA LED bulb E26 1600 lumen, dimmable/globe opal



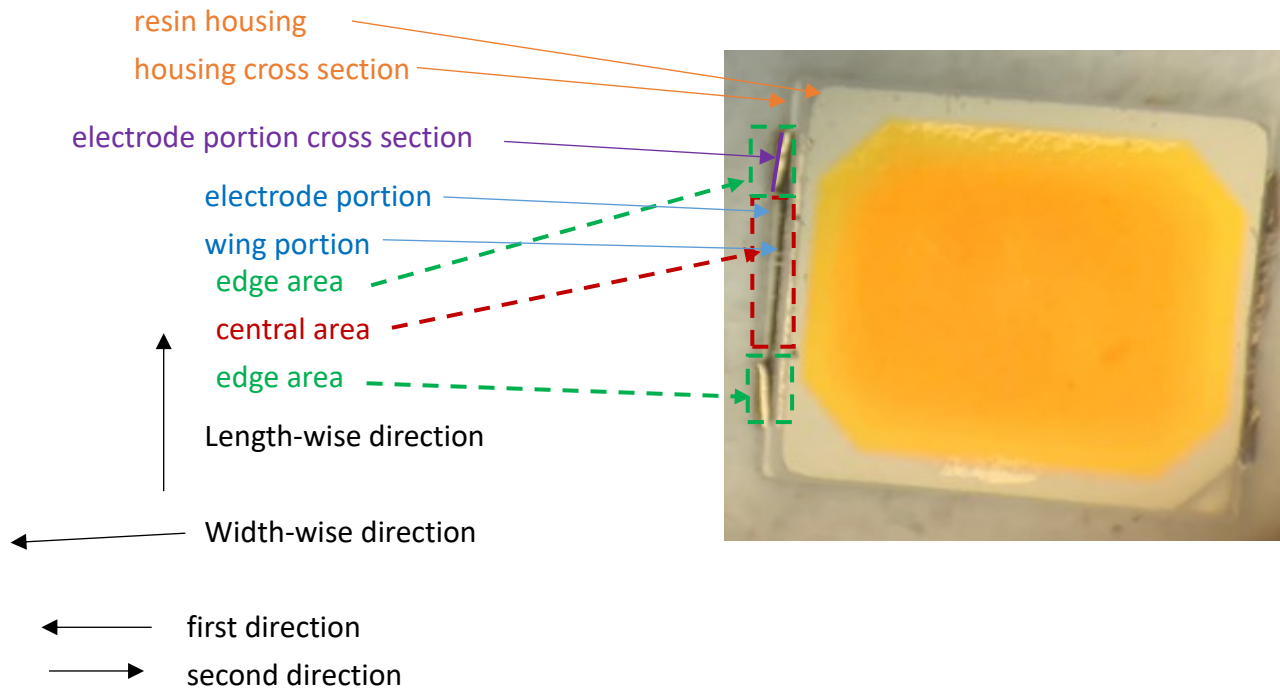
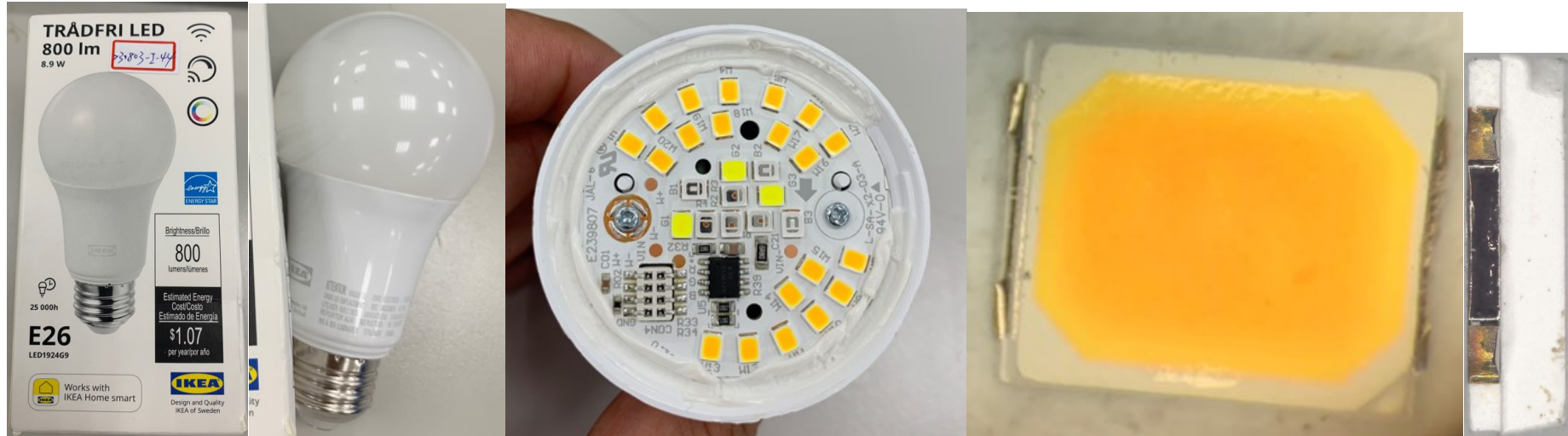
Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA SOLHETTA LED bulb PAR38 E26 900 lumen, dimmable, 2700 K



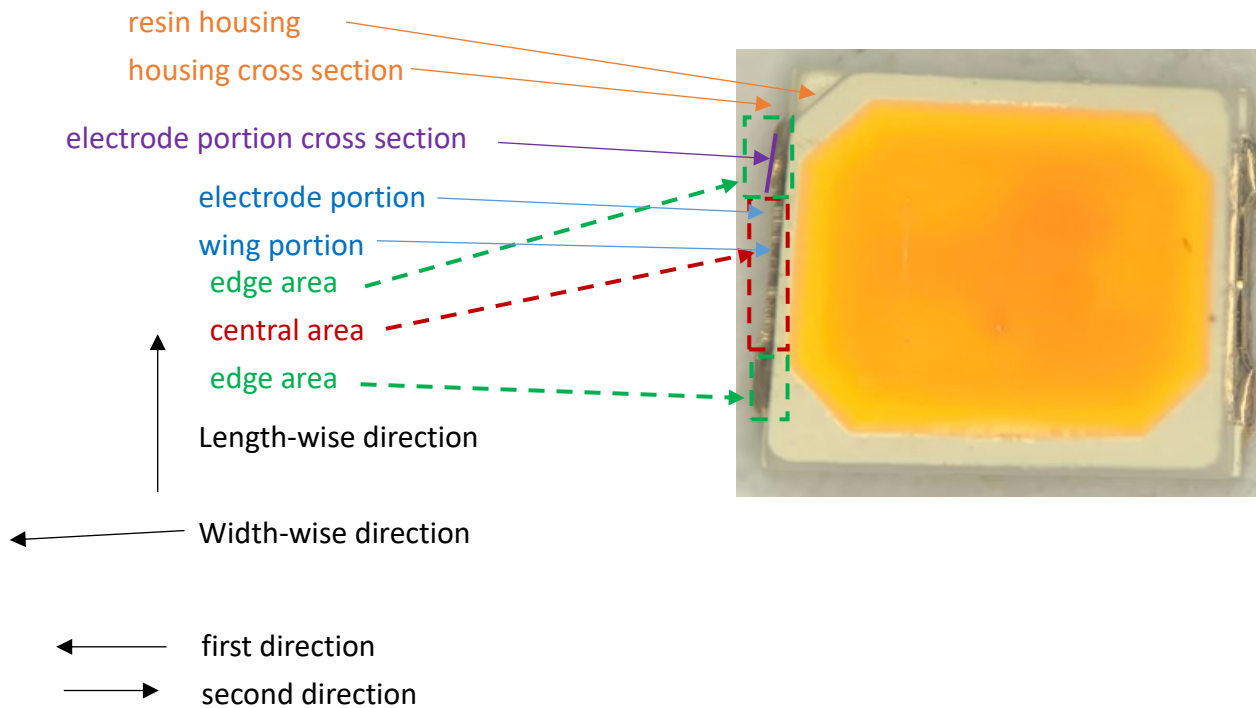
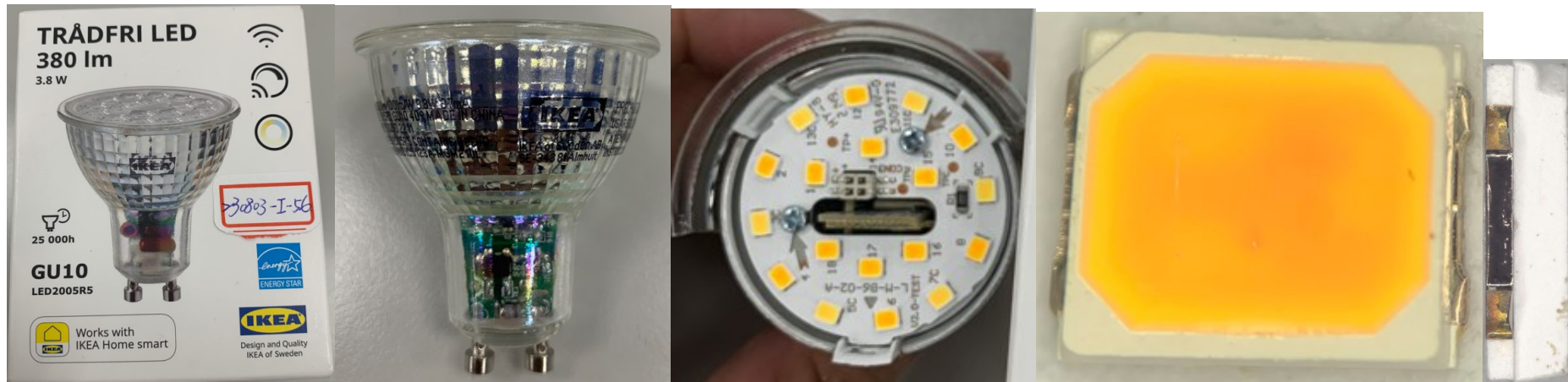
Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA SOLHETTA LED bulb GU10 380 lumen, 5000 K



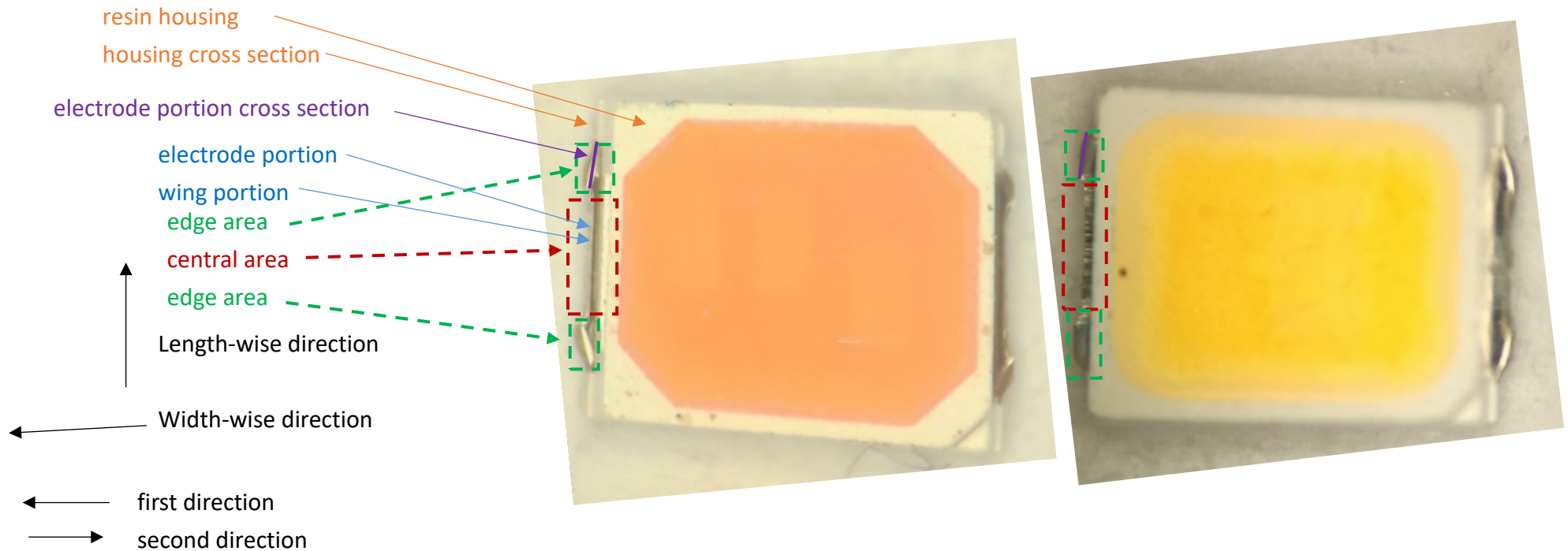
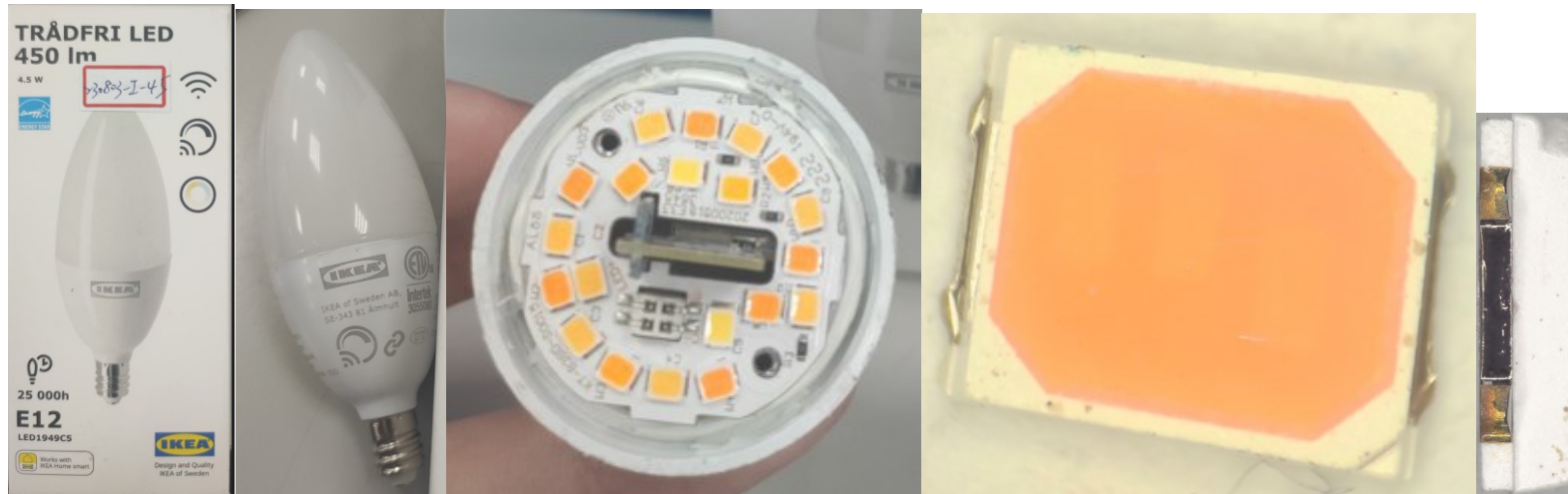
Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA TRÅDFRI LED bulb E26 800 lumen, smart wireless dimmable/color and white spectrum globe



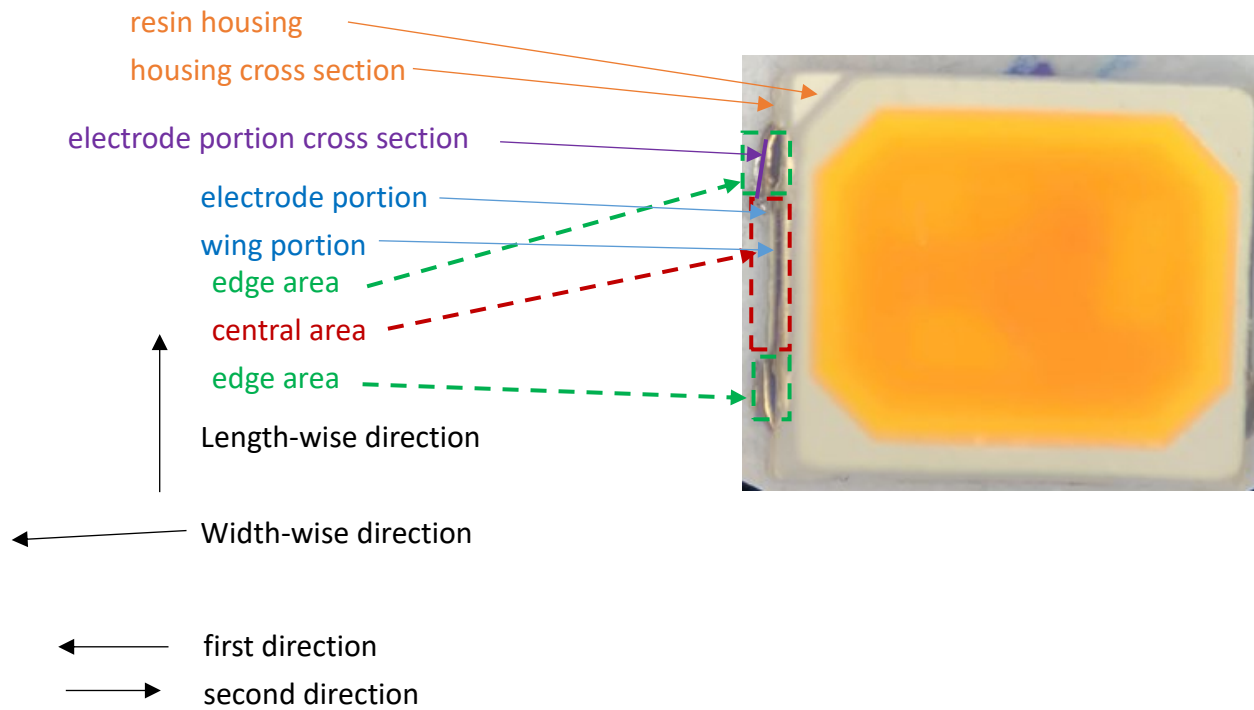
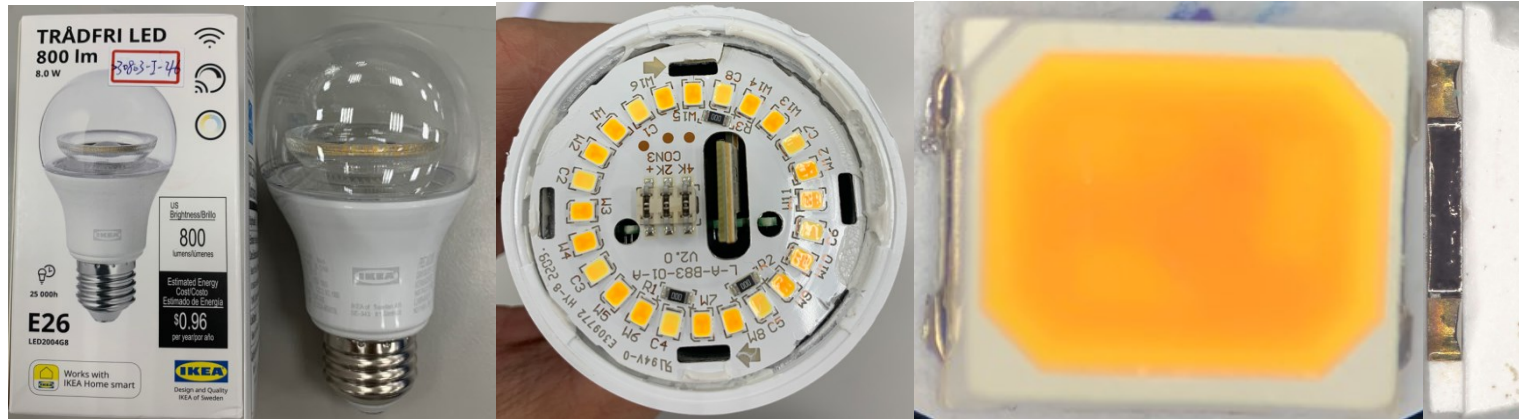
Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA TRÅDFRI LED bulb GU10 380 lumen, smart wireless dimmable/white spectrum



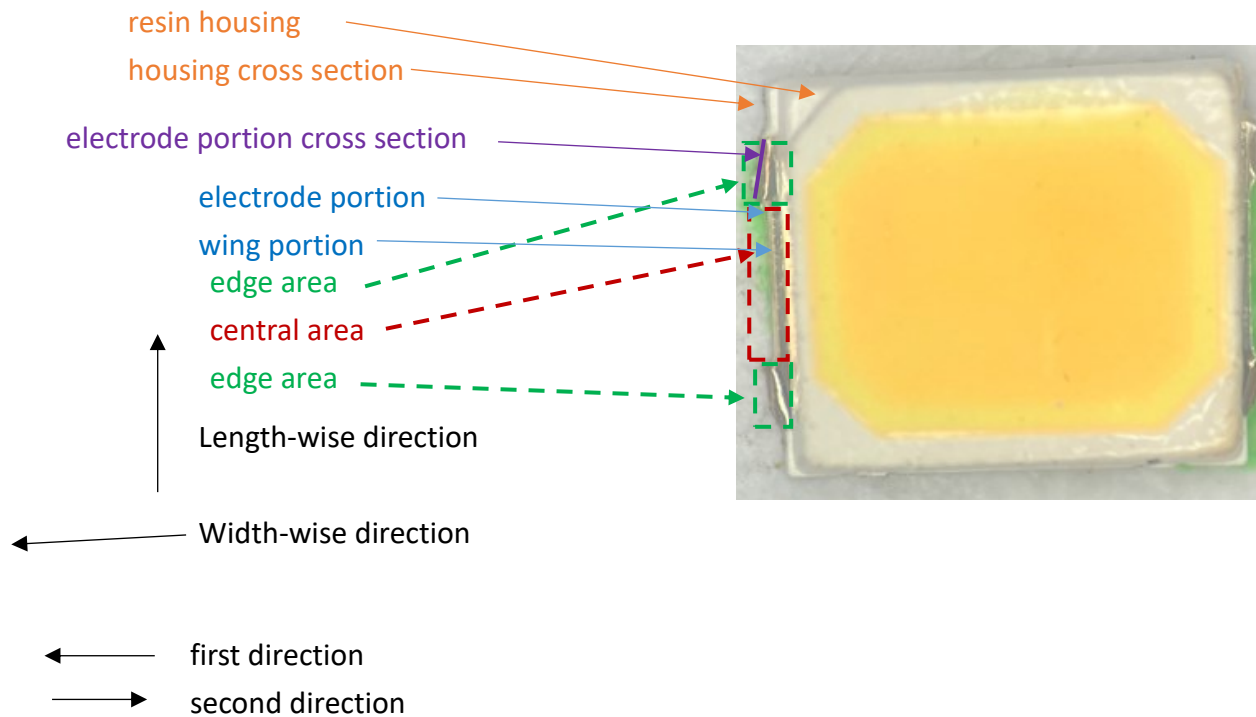
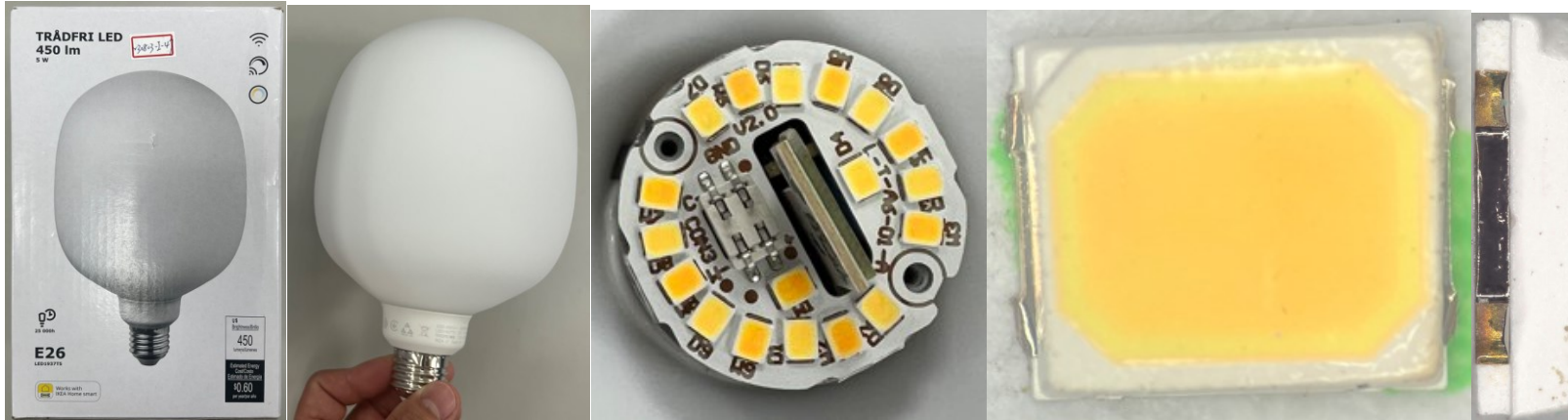
Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA TRÅDFRI LED bulb E12 450 lumen, smart wireless dimmable/white spectrum chandelier



Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA TRÅDFRI LED bulb E26 800 lumen, smart wireless dimmable/white spectrum globe



Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA TRÅDFRI LED bulb E26 450 lumen, smart wireless dimmable/white spectrum tube-shaped



Infringement of Claims 1-2, 5-15 and 20-21 of U.S. Patent No. 9,905,742 by IKEA TRÅDFRI LED bulb PAR38 E26 900 lumen, smart wireless dimmable/white spectrum

