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August 5, 2024

ELECTRONIC FILING

The Honorable Cameron Elliot
U.S. International Trade Commission
500 E Street, SW
Washington, D.C. 20436

Re: *Certain Smart Ceiling Fans, Components Thereof, and Associated Systems
and Software, Inv. No. 337-TA-1374*

Dear Judge Elliot:

Pursuant to Order No. 22, enclosed please find the Declaration of Etai Lahav in Support of Complainant Wangs Alliance Corporation d/b/a WAC Lighting's unopposed motion to terminate the Investigation based on withdrawal of the Complaint (Motion No. 1374-028).

Respectfully submitted,

/s/ John F. Presper
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*Counsel for Complainant
Wangs Alliance Corporation d/b/a WAC Lighting*

**UNITED STATES INTERNATIONAL TRADE
COMMISSION WASHINGTON, D.C.**

**Before the Honorable Cameron R. Elliot
Administrative Law Judge**

In the Matter of

**CERTAIN SMART CEILING FANS,
COMPONENTS THEREOF, AND
ASSOCIATED SYSTEMS AND
SOFTWARE THEREOF**

Investigation No. 337-TA-1374

**DECLARATION OF ETAI LAHAV IN SUPPORT OF COMPLAINANT
WANGS ALLIANCE CORPORATION D/B/A WAC LIGHTING'S UNOPPOSED
MOTION TO SUSPEND THE PROCEDURAL SCHEDULE AND TO TERMINATE**

I, Etai Lahav, declare:

1. I am a partner with the law firm of Radulescu LLP, counsel of record for Complainant Wangs Alliance Corporation d/b/a WAC Lighting ("Complainant"). I submit this Declaration in support of Complainant WAC's Unopposed Motion to Suspend the Procedural Schedule and to Terminate (EDIS Doc. ID. No. 825019, "Motion"). I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I have been practicing law for approximately seventeen years. I am licensed to practice law in the State of New York and have appeared as counsel in Federal Courts throughout the United States. I have also appeared before the Commission in a number of Investigations. I have never been sanctioned by any Court, tribunal, or other adjudicatory body, nor have I been ever subject to discipline from any bar. I am familiar with the Rules of the Commission and the obligations of attorneys practicing before the Commission.

3. In Order No. 22, Judge Elliot indicated that he intended to hold WAC's Motion to

Terminate open until a written agreement is filed. I declare on behalf of all parties that no further agreements between or among the parties, written or oral, are forthcoming; and that the entirety of the parties' agreements are captured in Footnote 1 of Complainant's Unopposed Motion to Suspend the Procedural Schedule and to Terminate the Investigation in Its Entirety.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 2nd day of August, 2024.

By: /s/Etai Lahav
Etai Lahav

**CERTAIN LED SMART CEILING FANS,
COMPONENTS THEREOF, AND ASSOCIATED
SYSTEMS AND SOFTWARE THEREOF**

INV. NO. 337-TA-1374

CERTIFICATE OF SERVICE

I, Michael Kirby, Jr., hereby certify that on August 5, 2024, a copy of the foregoing **DECLARATION OF ETAI LAHAV IN SUPPORT OF COMPLAINANT WANGS ALLIANCE CORPORATION D/B/A WAC LIGHTING'S UNOPPOSED MOTION TO SUSPEND THE PROCEDURAL SCHEDULE AND TO TERMINATE (PUBLIC)** was served upon the following parties as indicated:

The Honorable Lisa R. Barton Secretary to the Commission U.S. International Trade Commission 500 E Street, S.W., Room 112A Washington, DC 20436	☐ Via First Class Mail ☐ Via Hand Delivery ☐ Via Overnight Courier ☐ Via Electronic Mail ☒ Via EDIS
The Honorable Cameron R. Elliot Administrative Law Judge U.S. International Trade Commission 500 E Street, S.W., Room 317 Washington, DC 20436 Attorney Advisor Michael Turner Email: Michael.Turner@usitc.gov	☐ Via First Class Mail ☐ Via Hand Delivery ☐ Via Overnight Courier ☒ Via Electronic Mail
<i>Counsel for Respondents Tech Lighting LLC and VC Brands LLC</i> Benjamin Levi LEVI SNOTHERLY & SCHAUMBERG, PLLC 1101 Connecticut Avenue, N.W., Suite 450 Washington, DC 20036 Email: VCC-LSS-1374@levisnotherly.com Benjamin T. Horton Kelley S. Gordon Isha S. Shah MARSHALL, GERSTEIN & BORUN LLP 233 S. Wacker Drive Suite 6300 Chicago, IL 60606 Emails: bhorton@marshallip.com kgordon@marshallip.com ishah@marshallip.com ibegert@marshallip.com MGBLitDocket@marshallip.com	☐ Via First Class Mail ☐ Via Hand Delivery ☐ Via Overnight Courier ☒ Via Electronic Mail ☐ Via First Class Mail ☐ Via Hand Delivery ☐ Via Overnight Courier ☒ Via Electronic Mail

**CERTAIN LED SMART CEILING FANS,
COMPONENTS THEREOF, AND ASSOCIATED
SYSTEMS AND SOFTWARE THEREOF**

INV. NO. 337-TA-1374

Jim Adduci ADDUCI LLP 3230 Volta Place, NW Washington, DC 20007 Email: adduci@adducillp.com	☐ Via First Class Mail ☐ Via Hand Delivery ☐ Via Overnight Courier ☒ Via Electronic Mail
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/s/ Michael Kirby, Jr.

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