

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAVANT TECHNOLOGIES LLC d/b/a GE LIGHTING
and LEDVANCE LLC,
Petitioners,

v.

FEIT ELECTRIC COMPANY, INC.,
Patent Owner.

Case IPR2024-01357
U.S. Patent No. 8,604,678 B2

SAVANT TECHNOLOGIES LLC d/b/a GE LIGHTING,
ELONG INTERNATIONAL USA INC., and
XIAMEN LONGSTAR LIGHTING CO. LTD.,
Petitioners,

v.

FEIT ELECTRIC COMPANY, INC.,
Patent Owner.

Case IPR2024-00260
U.S. Patent No. 8,604,678 B2

PETITIONERS' SECOND OBJECTIONS TO EVIDENCE

Pursuant to 37 CFR § 42.64(b)(1), Petitioners submit the following objections to Patent Owner's evidence submitted with its Patent Owner Response and any reference to or reliance on the exhibits by Patent Owner. Petitioners' objections are made pursuant to the Code of Federal Regulations governing this proceeding, including 37 CFR §§ 42.61-42.65 and § 42.6(a)(3). As required by 37 CFR § 42.62, Petitioners' objections below apply the Federal Rules of Evidence.

Objections

1. Declaration of Dr. E. Fred Schubert, Ph.D (Exhibit 2026)

Grounds for objection: FRE 401, 402 (not relevant); FRE 403 (prejudice, confusion, waste of time); FRE 701, 702, 703 (improper expert testimony); FRE 801, 802, 803, 804, 805 (hearsay).

Exhibit 2026 is a declaration from Patent Owner's expert and is objected to in its entirety. Dr. Schubert fails to provide a reasoned basis for his opinions. Moreover, Dr. Schubert's opinions are not the product of reliable principles and methods. Dr. Schubert's opinions are further irrelevant to the extent that they are not cited in Patent Owner's Response or any other briefing. To the extent exhibit 2026 is deemed relevant, its admission would be unduly prejudicial, misleading, and a waste of time. Exhibit 2026 is further objected to under FRE 801-805 as constituting hearsay without satisfying any of the hearsay exceptions. In particular, exhibit 2026 is inadmissible hearsay to the extent that Dr. Schubert has not been

made available for cross-examination in a manner complying with the rules governing this proceeding.

2. *Alleged Evidence of Nonobviousness (Exhibits 2029-2037)*

Grounds for objection: FRE 401, 402 (not relevant); FRE 403 (prejudice, confusion, waste of time); FRE 602, 703, 901 (lacks authentication/foundation); FRE 801, 802, 803, 804, 805 (hearsay).

Exhibits 2029-2037 are printouts of websites. These exhibits are not cited in Patent Owner's Response or any other briefing and so are not relevant to any fact of consequence in this trial. Thus, any possible probative value is substantially outweighed by the risk of confusing the issues and wasting time. Further, these exhibits have not been authenticated, lack foundation, and are objected to as hearsay.

Date: July 2, 2025

Respectfully submitted,

/s/ David C. Radulescu

David C. Radulescu, Lead Counsel
Reg. No. 36,250

CERTIFICATE OF SERVICE

The undersigned certifies that on July 2, 2025 the foregoing was served on counsel at the following electronic service addresses:

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Date: July 2, 2025

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