

From: [Director_PTABDecision_Review](#)
To: [McMahon, Charles](#); [David Radulescu](#); [Etai Lahav](#); [Andrew Brown](#); [Savant_IPR_Service](#); [FeitElectricIPR](#)
Subject: RE: Request to Supplement the Record (IPR2024-01357, IPR2025-00260) - Request for an extension to the deadline to request Director Review of the Decisions - Denied
Date: Wednesday, November 19, 2025 1:40:00 PM

Counsel,

Patent Owner's request for an extension to the deadline to request Director Review of the Decisions on Institution in the above identified proceedings based on good cause pursuant to Rule 42.75(c)(1) is denied.

Thanks.

IPR2024-01357 and IPR2025-00260
Ex. 3101

From: McMahon, Charles <CMcMahon@beneschlaw.com>
Sent: Wednesday, November 19, 2025 9:34 AM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>; David Radulescu <david@radip.com>; Etai Lahav <etai@radip.com>; Andrew Brown <andy@radip.com>; Savant_IPR_Service <Savant_IPR_Service@radip.com>; FeitElectricIPR <FeitElectricIPR@beneschlaw.com>
Subject: Re: Request to Supplement the Record (IPR2024-01357, IPR2025-00260) - Untimely

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Director Review:

Thank you for your message. Respectfully, however, this request is subject to a good cause exception.

Rule 42.75(c)(1) permits the Director to extend the deadline for requesting Director Review upon a showing of good cause. Patent Owner's Request specifically identified the good cause in this case, including the recent change in the law documented in the Director's October 28, 2025 Memorandum designating as precedential the requirement to identify all real parties in interest in the petition. *See* Paper 47 (Patent Owner's Request) at 3. This requirement was not in effect at the time these proceedings were instituted, and the change in law provides good cause for extending the deadline to seek Director Review, consistent with Rule 42.75(c)(1). *See* Paper 47 (Patent Owner's Request) at 1-3; *see also* *Biodelivery Sci. Int'l, Inc. v. Aquestive Therapeutics, Inc.*, 898 F.3d 1205, 1208-1210 (Fed. Cir. 2018) (reversing the Board and holding that an intervening change in the law is good cause for considering an otherwise untimely request).

Good cause based on the recent change in the law is particularly significant here due to the Director's stated concerns about foreign business interference and exploitation by foreign state-backed actors in his recent memo (attached). *See* Director's October 28, 2025 Memorandum at 2. The unnamed real party in interest here is a Chinese company with ties to the Chinese government, as Patent Owner's Request explains in detail. *See* Paper 47 (Patent Owner's Request) at 5-6, 9-12. For convenience, we are attaching a copy of the Director's October 28, 2025 Memorandum.

Patent Owner respectfully requests that the Director consider Patent Owner's request for an extension based on good cause pursuant to Rule 42.75(c)(1). *See* Paper 47 (Patent Owner's Request) at 1-3.

Respectfully submitted,
Charles M. McMahon
Counsel for Patent Owner Feit Electric Company, Inc.

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From: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>

Date: Tuesday, November 18, 2025 at 7:20 AM

To: McMahon, Charles <CMcMahon@beneschlaw.com>, David Radulescu <david@radip.com>, Etai Lahav <etai@radip.com>, Andrew Brown <andy@radip.com>, Savant_IPR_Service <Savant_IPR_Service@radip.com>, FeitElectricIPR <FeitElectricIPR@beneschlaw.com>

Subject: RE: Request to Supplement the Record (IPR2024-01357, IPR2025-00260) - Untimely

Counsel,

A Decision Granting Institution in IPR2024-01357 was issued on March 5, 2025. A Decision Granting Institution in IPR2025-00260 was issued on June 23, 2025. Any request for Director Review was due within 14 days of the Decision Granting Institution. See 37 C.F.R. § 42.75(c)(1) and 37 C.F.R. § 42.71(d). Patent Owner's request for Director Review of the Board's Decisions on Institution in the above identified proceedings, filed on November 14, 2025, is untimely and will not be considered.

Thanks.

From: McMahon, Charles <CMcMahon@beneschlaw.com>

Sent: Friday, November 14, 2025 8:36 PM

To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>

Cc: David Radulescu <david@radip.com>; Etai Lahav <etai@radip.com>; Andrew Brown <andy@radip.com>; Savant_IPR_Service <Savant_IPR_Service@radip.com>; FeitElectricIPR <FeitElectricIPR@beneschlaw.com>

Subject: Request to Supplement the Record (IPR2024-01357, IPR2025-00260)

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Director Review:

On behalf of Patent Owner Feit Electric in this consolidated *inter parties* review, we have filed today a Request for Director Review of the Institution Decisions based on two important changes that the Director recently made in the law. The Request seeks Director Review and termination of the proceedings based on two failures by Petitioners to disclose material information in the petitions:

- (1) Petitioner LEDVANCE's failure to identify its Chinese parent company as a real party in interest in the petition, and
- (2) all four Petitioners' failure to notify or explain to the Board that they made arguments to three different district courts that contradict the claim construction arguments Petitioners made in their petitions to the Board.

The Director's recent changes in the law merit Director Review to consider these intentional nondisclosures.

In support of the Request for Director Review, Patent Owner seeks the Director's authorization pursuant to 37 C.F.R. 42.75(c)(3) to supplement the record with important evidence related to both of Petitioners' nondisclosures. The proposed new exhibits are listed below.

Proposed Exhibit Number	Proposed Exhibit
2040	March 3, 2017 LEDVANCE Press Release, <i>available at</i> https://www.ledvance.com/en-int/company/press/press-releases/2017/chinese-consortium-completes-acquisition-of-ledvance-n159186 (last accessed on November 13, 2025)
2041	March 4, 2018 LEDVANCE Press Release, <i>available at</i> https://www.ledvance.com/unternehmen/newsroom/pressemeldungen/2018/mls-wird-alleiniger-eigentumer-von-ledvance-n159699 (last accessed on November 13, 2025)
2042	MLS International Website, <i>available at</i> https://www.mls-ledlights.com/html_news/?2-Welcome-to-our-website-1.html#:~:text=Qinghuan%20Sun%2C%20President%20of%20MLS,Canada%20on%20an%20interim%20basis (last accessed on November 13, 2025)
2043	MLS Website "Our Team" available at https://www.led-mls.com/our-team.html (last accessed on November 13, 2025)
2044	LEDVANCE Wikipedia page, <i>available at</i> https://en.wikipedia.org/wiki/LEDVANCE (last accessed on November 13, 2025)
2045	MLS International Website, <i>available at</i> https://www.mls-ledlights.com/html_news/?1-Welcome-to-our-website-1.html (last accessed on November 13, 2025)
2046	MLS International Website, <i>available at</i> https://www.mls-ledlights.com/html_news/?3-Welcome-to-our-website-1.html (last accessed on November 13, 2025)
2047	MLS LinkedIn page, <i>available at</i> https://www.linkedin.com/company/china-electronics-corporation-beijing/ (last accessed on November 13, 2025)
2048	Entities Identified as Chinese Military Companies Operating in the United States in accordance with Section 1260H of the William M. ("Mac") Thornberry National Defense Authorization Act for Fiscal Year 2021 (Public Law 116-283), <i>available at</i> https://media.defense.gov/2024/Jan/31/2003384819/-1/-1/0/1260H-LIST.PDF (last accessed on November 13, 2025)
2049	August 18, 2024 FitchRatings Commentary on Yiwu State-Owned Capital Operation, <i>available at</i> https://www.fitchratings.com/research/international-public-finance/fitch-affirms-yiwu-state-owned-capital-operation-at-bbb-outlook-stable-18-08-2024 (last accessed on November 13, 2025)
2050	June 12, 2025 CCXAP Credit Rating Commentary on Yiwu State-Owned Capital Operation, <i>available at</i> https://www.ccxap.com/upload/news/1358/self/684a996a624bc.pdf (last accessed on November 13, 2025)
2051	LEDVANCE Opening Claim Construction Brief, <i>Feit Electric Company, Inc. v.</i>

	<i>LEDVANCE, LLC</i> , Case No. 5:24-00031 Dkt. 54-1 (E.D. Ky.)
2053	Elong and Xiamen Longstar Responsive Claim Construction Brief, <i>Feit Electric Company, Inc. v. Elong Int'l USA, Inc., et al.</i> , Case No. 3:24-cv-01089, Dkt. 52 (N.D. Tex.)
2054	Savant Opening Claim Construction Brief, <i>Feit Electric Company, Inc. v. Savant Techs. LLC</i> , Case No. 1:24-cv-473, Dkt. 45 (N.D. Ohio)
2055	Returned summons confirming service of the complaint on March 14, 2024, in <i>Feit Electric Company, Inc. v. Savant Techs. LLC</i> , Case No. 1:24-cv-473 (N.D. Ohio)
2056	“Chinese packaged LED manufacturer MLS buys stake in Kaistar Lighting,” BUILDINGS, available at https://www.buildings.com/building-systems-om/lighting/article/55257801/chinese-packaged-led-manufacturer-mls-buys-stake-in-kaistar-lighting (last accessed on November 13, 2025)

Respectfully submitted,

Charles M. McMahon

Counsel for Patent Owner *Feit Electric Company, Inc.*



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