

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.

IPR2024-01357
Patent 8,604,678

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.

IPR2025-00260
Patent 8,604,678

**PETITIONERS' OPPOSITION TO PO'S MOTION TO TERMINATE FOR
ALLEGED FAILURE TO NAME A REAL PARTY IN INTEREST**

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I. INTRODUCTION

Petitioner LEDVANCE LLC is an independently operated American company that filed this IPR, along with its co-Petitioners, for its own benefit, after it was sued by Patent Owner (“PO”) for allegedly infringing the ’678 patent in the United States. Accordingly, PO’s motion to terminate this proceeding for LEDVANCE LLC’s alleged failure to name a real party in interest should be denied.

PO never addresses the question the Board must answer to determine whether MLS Co. Ltd. (“MLS”), a publicly traded Chinese company, is an RPI: whether MLS is “a clear beneficiary that has a preexisting, established relationship with” LEDVANCE LLC; that is, MLS must be one that “desires review of the patent” and at whose “behest” the petition was filed. *Applications in Internet Time, LLC v. RPX Corp.*, 897 F.3d 1336, 1351 (Fed. Cir. 2018); Office Patent Trial Practice Guide, 77 Fed. Reg. 48,756, 48,759 (Aug. 14, 2012); *see Corning Optical Commc’ns RF, LLC v. PPC Broadband, Inc.*, IPR2014-00440, Paper 68 at 11 (PTAB Aug. 18, 2015) (precedential). Instead, PO asks the Board to infer that MLS, which sits atop LEDVANCE’s corporate chain, is an RPI based on corporate ownership and insinuation alone, without any evidence connecting MLS to this proceeding.

But LEDVANCE LLC is not a shell company controlled from abroad. The Declaration of Andrew Martin, General Counsel of LEDVANCE LLC, establishes that LEDVANCE LLC independently authorized, funded, and directed this proceeding for its own defense, with no involvement by LEDVANCE GmbH or MLS at any stage. PO's motion should be denied.

II. ARGUMENT

PO's motion fails on the law and the facts.

A. LEDVANCE LLC filed this IPR for its own benefit, without MLS involvement

Even if PO's publicly available corporate structure evidence (as discussed below) could satisfy the evidentiary showing required under *Worlds Inc. v. Bungie, Inc.*, 903 F.3d 1237, 1242-44 (Fed. Cir. 2018), Petitioners more than carry their burden of persuasion on both sides of the RPI inquiry: motive and action.

PO's theory rests on a premise the law rejects: that corporate ownership alone establishes RPI status. It does not. The four entities in LEDVANCE's corporate chain are separate companies, separately managed, in separate countries, with separate leadership. None of the facts PO cites connects MLS to this proceeding.

LEDVANCE LLC is the petitioner, a U.S. operating company headquartered in Wilmington, Massachusetts, and the successor to the SYLVANIA lighting

business, which has operated in the United States since 1901. Martin Decl. ¶¶ 2-4; EX1069; EX1070 (documenting 1901 Massachusetts founding). Its CEO is Jonathan Lubeck, a veteran of the SYLVANIA organization. EX1071.

LEDVANCE LLC was sued by Feit Electric for infringing the '678 patent. Martin Decl. ¶ 16; EX1072 (*Feit Electric Co. v. LEDVANCE LLC*, No. 5:24-cv-00031 (E.D. Ky.), Complaint). It filed this IPR to defend itself. Martin Decl. ¶ 18.

LEDVANCE GmbH is LEDVANCE LLC's parent, a global lighting company headquartered in Garching, Germany, the successor to Osram's general lighting division, tracing its origins to the 1880s. Martin Decl. ¶ 5; EX1073. It is the operating parent of a worldwide lighting group active in over 140 countries, with more than 50 subsidiaries. *Id.* One of its Managing Directors is Qinghuan Sun, the founder of MLS. Martin Decl. ¶ 7; EX1074 (LEDVANCE GmbH Impressum); *see also* EX1075 (English-language Impressum listing Managing Directors and Munich Commercial Register HRB 220074). LEDVANCE GmbH was not sued by PO, is not an accused infringer, and had no involvement in the preparation or filing of this petition. Martin Decl. ¶¶ 17, 19-31.

MLS Co. Ltd. is the alleged RPI. MLS owns LEDVANCE GmbH and is publicly traded on the Shenzhen Stock Exchange (ticker: 002745). EX1076. Sun, its founder, holds approximately 40% of shares personally and is its controlling shareholder; the remaining shares are held by institutional investors, the general

public, and minority corporate shareholders. Martin Decl. ¶ 6; EX1077 (ISA biography of Qinghuan Sun, confirming founding of MLS in 1997 and role as Chairman/President). MLS was not sued by PO, is not an accused infringer, and had no involvement in the preparation or filing of this petition. Martin Decl. ¶¶ 30, 34.

LEDVANCE LLC operates independently of both LEDVANCE GmbH and MLS. Martin Decl. ¶ 12. LEDVANCE LLC has its own General Counsel and its own management. Martin Decl. ¶¶ 1, 13. PO's attempt to show overlap in management rests on conflating LEDVANCE LLC with LEDVANCE GmbH. PO claims that MLS and LEDVANCE "share the same leader, Mr. Qinghuan Sun" (Motion at 1), but Sun serves as a Managing Director of LEDVANCE GmbH—the German parent—not of LEDVANCE LLC, the petitioner in this proceeding. Martin Decl. ¶¶ 14-15 (Mr. Sun holds no position at LEDVANCE LLC and has had no involvement in this proceeding). Neither LEDVANCE GmbH nor MLS has been sued by PO, and PO has never alleged that either entity could face liability for infringing the '678 patent. Martin Decl. ¶¶ 17, 19-29, 32. PO never connects anyone other than LEDVANCE LLC to any decision regarding LEDVANCE LLC's participation in this IPR because there is no such connection to make.

The Declaration of Andrew Martin, General Counsel of LEDVANCE LLC, confirms this independence. Only two LEDVANCE LLC personnel worked on the

petition: Mr. Martin, who is also a registered patent attorney and former patent examiner, and Robert Clark, a registered patent attorney and former head of intellectual property at OSRAM SYLVANIA, now a consultant to LEDVANCE LLC. Martin Decl. ¶ 22. Neither LEDVANCE GmbH nor MLS uses a centralized IP department to manage LEDVANCE LLC's IP litigation; counsel at LEDVANCE LLC handles IP litigation directly, and no one outside of LEDVANCE LLC controls the prosecution of this IPR or acts in a supervisory capacity. Martin Decl. ¶¶ 19-29, 32-33; No employee of LEDVANCE GmbH or MLS saw the draft petition or had any involvement in the decision to file. LEDVANCE LLC paid all counsel fees. *Id.* LEDVANCE LLC is the entity that desired review of this patent, and it is the only entity with a direct commercial stake in this proceeding. *Id.*

B. There is no evidence connecting MLS to this proceeding

The Director has made clear what he expects when RPI is challenged. In *Yangtze Memory Techs. Co. v. Micron Tech., Inc.*, IPR2025-00098, Paper 38 (Director Jan. 15, 2026) (informative), the Director vacated institution because the petitioner refused to identify who authorized, funded, or directed the proceeding, offering corporate generalities and evasion rather than addressing the question. LEDVANCE LLC has done exactly what YMTC would not: Mr. Martin's declaration identifies the specific individuals who decided to file, confirms that

LEDVANCE LLC alone funded the proceeding, and establishes that no one outside LEDVANCE LLC exercised any control. Martin Decl. ¶¶ 19-29.

That this showing suffices is confirmed by what happened the day after *YMTC*. In *BOE Tech. Group Co. v. Paneltouch Techs. LLC*, the Director addressed—and rejected—an RPI challenge to another Chinese publicly traded company. IPR2025-01482, Paper 10 at 2 n.1 (Director Jan. 16, 2026); *see also* IPR2025-01245, Paper 10 at 3 n.4; IPR2025-01246, Paper 10 at 3 n.5 (same). The patent owner there had cited BIS Entity List allegations, a Congressional committee letter characterizing BOE as a “state-backed foreign actor,” and BOE’s own annual report identifying a state-owned entity as its “actual controller.” Paper 7 at 5-7. BOE responded with a corporate officer declaration establishing operational independence. The Director found the RPI arguments “not . . . persuasive.” Paper 10 at 2 n.1. PO here has marshaled significantly less: no BIS Entity List, no Congressional findings, no state-ownership admission. If the Director found Paneltouch’s stronger evidence unpersuasive, PO’s showing cannot warrant termination.

PO cites no authority for the proposition that corporate ownership alone establishes RPI status. PO’s own principal authority, *Corning*, IPR2014-00440, Paper 68, illustrates what PO is missing. There, the Board found an RPI only after discovery revealed the parent paid all IPR legal fees, the parent’s IP department

selected and managed outside counsel, and the corporate structure was “so intertwined” that the Board found it “difficult for both insiders and outsiders to determine precisely where one [company] ended and another began.” *Id.* at 5-11. Here, the record shows the opposite: the Martin Declaration establishes that LEDVANCE LLC alone funded the proceeding, selected counsel, and directed strategy without any involvement by LEDVANCE GmbH or MLS. PO has none of what *Corning* required, and never even sought discovery into who funded or directed this IPR. And the Board and Federal Circuit have repeatedly rejected RPI challenges based on corporate ownership without such proceeding-specific evidence, even where the relationship was closer than the one here. *See Par Pharm., Inc., et al. v. Jazz Pharms., Inc.*, IPR2015-00546, Paper 25 at 15-19 (PTAB July 28, 2015) (wholly owned subsidiary with shared officers and shared outside counsel not RPI where petitioner solely funded and directed IPR); *LG Elecs., Inc., et al. v. Fundamental Innovation Sys. Int’l LLC*, IPR2018-00683, Paper 7 at 5-6 (PTAB Sept. 27, 2018) (30%-plus ownership with shared commercial programs insufficient). Any parent benefits indirectly when its subsidiary prevails; that has never been the test. *See Par Pharm.*, Paper 25 at 17; Martin Decl. ¶ 35.

Petitioner LEDVANCE LLC has provided clear evidence that it independently desired review of this patent and independently authorized, funded,

and directed this proceeding without any involvement by MLS. Martin Decl. ¶ 39.

PO's motion should be denied on this basis alone.

C. PO's state-actor narrative is unsupported and self-defeating

The Director's October 28, 2025 Memorandum targets "covert financing" and "the misuse of AIA proceedings by foreign adversaries" through undisclosed state backing. Memorandum at 4. That concern does not describe this case. MLS's ownership of LEDVANCE GmbH has been publicly known since 2017, disclosed in corporate filings, and cleared by CFIUS. Martin Decl. ¶¶ 8-11. Chinese operations are ubiquitous in the lighting industry—PO itself manufactures products in China. EX1078. And PO's characterization of MLS as a state-controlled entity is factually wrong. MLS is a founder-controlled public company: Qinghuan Sun founded it in 1997 and holds approximately 40% of shares personally. Martin Decl. ¶ 6; EX1077. This is nothing like *YMTC*, where the petitioner was directly owned by state-owned enterprises. Paper 38 at 5-7. CFIUS reviewed and unconditionally cleared the consortium acquisition of LEDVANCE GmbH in February 2017, including the participation of Yiwu State-Owned Assets Operation Center, during the same period it was blocking Chinese semiconductor acquisitions on national security grounds. EX1079; EX1080. MLS subsequently bought out Yiwu's direct stake in LEDVANCE GmbH in March 2018, removing the state-owned entity from the ownership chain entirely. Martin Decl. ¶ 9; EX2041. PO has

less than what the Director found unpersuasive in *BOE Tech.*: no Entity List, no Congressional findings, no state-ownership chain.

PO's remaining government-connection argument undercuts its own position. PO points to MLS's co-investment with China Electronics Corporation ("CEC") in Kaistar Lighting, noting that CEC appears on the Department of Defense's list of Chinese Military Companies. Motion at 7-8. But that minority investment has nothing to do with LEDVANCE LLC or this IPR. More to the point, the '678 patent was acquired by Feit from Intematix Corporation, EX1083 (USPTO Assignment Records, Reel 060078, Frame 0465 (recorded June 2, 2022)), and Intematix is a brand of Bridgelux (Xiamen) Co., Ltd. (formerly Kaistar Lighting), the same CEC-connected entity PO invokes. EX1081 (identifying Intematix and Bridgelux as Kaistar's two LED brands); *see also* EX1082 (confirming "Kaistar is a subsidiary of CEC"). It is PO's enforcement of the '678 patent, not Petitioners' challenge to it, that directly enriches the entities PO characterizes as connected to the Chinese military. PO's state-actor theory is both factually wrong and strategically self-defeating.

D. PO's request for termination cannot reach IPR2025-00260

Even if the Board were to determine that MLS is an RPI of LEDVANCE LLC and terminate IPR2024-01357, PO's request for wholesale termination of both proceedings (Motion at 10) finds no support in the statute or case law.

IPR2025-00260 was filed independently by Savant, Elong, and Xiamen Longstar, none of which has any corporate relationship to MLS. IPR2025-00260, Paper 1 (Petition). LEDVANCE LLC is not a petitioner in that proceeding. Martin Decl. ¶¶ 36-38. The two proceedings were later consolidated for efficiency under 35 U.S.C. § 315(d), but consolidation is not joinder. *See Facebook, Inc. v. Windy City Innovations, LLC*, 973 F.3d 1321, 1330 (Fed. Cir. 2020) (en banc). Consolidation does not merge proceedings into one; each retains its separate procedural identity and its own statutory compliance. PO identifies no statutory basis for terminating IPR2025-00260 based on an alleged RPI defect in a different proceeding. An alleged RPI defect as to LEDVANCE LLC has no bearing on a separate petition filed by different parties. At a minimum, IPR2025-00260 must proceed to final written decision regardless of the outcome of PO's motion.

III. CONCLUSION

The motion should be denied. LEDVANCE LLC independently authorized, funded, and directed this IPR, with no involvement by MLS. PO offers no proceeding-specific evidence to the contrary. Even if the Board were to find an RPI issue as to LEDVANCE LLC, IPR2025-00260 must proceed to final written decision.

IPR2024-01357, IPR2025-00260

U.S. Patent No. 8,604,678

Date: February 20, 2026

Respectfully submitted,

/s/David C. Radulescu

David C. Radulescu, Lead Counsel

Reg. No. 36,250

APPENDIX A – EXHIBIT LIST

Exhibit	Description
EX1001	U.S. Patent No. 8,604,678
EX1002	Declaration of William A. Doolittle, Ph.D.
EX1003	Curriculum Vitae of William A. Doolittle, Ph.D.
EX1004	File History for U.S. Pat. Appl. No. 13/273,212 (excl. references)
EX1005	U.S. Pat. Pub. No. 2009/0057699 (“Basin-2007”)
EX1006	U.S. Pat. Pub. No. 2007/0045761 (“Basin-2005”)
EX1007	U.S. Pat. Pub. No. 2008/0079015 (“Krummacher”)
EX1008	U.S. Patent No. 6,791,259 (“Stokes”)
EX1009	U.S. Patent No. 5,998,925 (“Shimizu-APA”)
EX1010	U.S. Patent No. 6,069,440 (“Shimizu”)
EX1011	U.S. Pat. Pub. No. US2010/0124243 (“Hussell”)
EX1012	DuPont: Polymers, Light and the Science of TiO ₂ (2007)
EX1013	DuPont: Titanium Dioxide for Coatings (2007)
EX1014	Erik S. Thiele and Roger H. French, “ <i>Computation of Light Scattering by Anisotropic Spheres of Rutile Titania</i> ”, Adv. Mater. 1998, 10, No. 15
EX1015	Erik S. Thiele and Roger H. French, “ <i>Light-Scattering Properties of Representative, Morphological Rutile Titania Particles Studied Using a Finite-Element Method</i> ”, J. Am. Ceram. Soc., 81 [3] 469–79 (1998)
EX1016	Robert W. Johnson, Erik S. Thiele, And Roger H. French, “ <i>Light-scattering efficiency of white pigments: an analysis of model core - shell pigments vs. optimized rutile TiO₂</i> ”, TAPPI JOURNAL, November 1997, Vol. 80(11)
EX1017	William D. Ross, “ <i>Theoretical Light-Scattering Power of TiO₂ and Microvoids</i> ”, Ind. Eng. Chem., Prod. Res. Develop., Vol. 13, No. 1, 1974
EX1018	Feit Electric’s Initial Infringement Contentions - Claim Charts (May 28, 2024)
EX1019	U.S. Patent No. 8,547,010 (“Jagt”)
EX1020	Int’l Pat. Pub. No. WO 2008/044171 A2 (“Van Woudenberg”)
EX1021	Declaration of Etai Lahav
EX1022	Declaration of William A. Doolittle, Ph.D. regarding claims 11-14 of the ’678 patent

Exhibit	Description
EX1023	Sudhakar Madhusoodhanan and Devdatt S. Nagvekar, “UV Curable High Opacity Ink Jettable White Ink”, RadTech e 5 2006 Technical Proceedings (2006)
EX1024	U.S. Pat. Pub. No. 2011/0001151 (“Toquin”)
EX1025	<i>Feit Elec. Co. v. Savant Techs. LLC d/b/a GE Lighting</i> , No. 1:24-cv-473 (N.D. Ohio), December 12, 2024 docket entry
EX1026	Kentucky Eastern, U.S. District Court – Judicial Caseload Profile (September 30, 2024), available at https://perma.cc/C3LU-9ET5
EX1027	U.S. District Courts – Median Time from Filings to Trial for Civil Cases (March 31, 2024), available at https://perma.cc/6FA3-3G89
EX1028	Civil Docket for No. 3:20-cv-3126 (N.D. Tex.)
EX1029	<i>Feit v. LEDVANCE</i> , Scheduling Order, No. 5:24-cv-31 (E.D. Ky.), Dkt. 33
EX1030	<i>Feit v. Savant</i> , Joint Motion for Leave to Amend the Case Management Order, National Science Foundation, Semiannual Report to Congress, dated September 2010. (so ordered January 7, 2025 setting claim construction hearing for May 27, 2025).
EX1031	<i>Feit v. Elong</i> , Scheduling Order, No. 3:24-cv-1089 (N.D. Tex.), Dkt. 37.
EX1032	<i>Feit v. Savant</i> , Case Management Order, No. 1:24-cv-473 (N.D. Ohio), Dkt. 19.
EX1033	Stipulations re District Court Litigations.
EX1034	<i>Feit v. LEDVANCE</i> , Plaintiff’s Preliminary Claim Constructions, No. 5:24-cv-31 (E.D. Ky.), served Nov. 6, 2024.
EX1035	<i>Feit v. Savant</i> , Plaintiff’s Final Claim Constructions, No. 1:24-cv-473 (N.D. Ohio), served Dec. 10, 2024.
EX1036	<i>Feit v. Elong</i> , Joint Claim Construction and Prehearing Statement, No. 3:24-cv-1089 (N.D. Tex.), Dkt. 45.
EX1037	<i>Feit v. LEDVANCE</i> , Plaintiff’s Disclosure of Initial Infringement Contentions, No. 5:24-cv-31 (E.d. Ky.), served Aug. 30, 2024.
EX1038	<i>Feit v. Savant</i> , Supplemental Initial Infringement Contentions, No. 1:24-cv-473 (N.D. Ohio), served Oct. 8, 2024.

Exhibit	Description
EX1039	<i>Feit v. Elong</i> , Plaintiff's Disclosure of Asserted Claims and Preliminary Infringement Contentions, No. 3:24-cv-1089 (N.D. Tex.), served Oct. 23, 2024.
EX1040	<i>Feit v. Elong</i> , Memorandum and Opinion Order, dated May 5, 2025, No. 3:24-cv-1089 (N.D. Tex.), Dkt. 60.
EX1041	National Science Foundation, Closeout Memorandum, Case Number: I-09080045.
EX1042	National Science Foundation, Semiannual Report to Congress, dated September 2010.
EX1043	National Science Foundation, 2011 FOIA Logs.
EX1044	<i>Feit v. Elong</i> , Memorandum and Opinion Order, dated July 2, 2025, No. 3:24-cv-1089 (N.D. Tex.), Dkt. 81.
EX1045	S. Ye, et al., <i>Phosphors in phosphor-converted white light-emitting diodes: Recent advances in materials, techniques and properties</i> , Materials Science and Engineering R 71 (2010) 1–34
EX1046	U.S. Department of Energy, <i>Life-Cycle Assessment of Energy and Environmental Impacts of LED Lighting Products</i> , Part 2: LED Manufacturing and Performance, dated May 2012.
EX1047	Philippe F. Smet, et al., <i>Selecting Conversion Phosphors for White Light-Emitting Diodes</i> , 2011 J. Electrochem. Soc. 158 R37
EX1048	Deposition Transcript of E. Fred Schubert, Ph.D. M.S., dated September 12, 2025.
EX1049	U.S. Patent No. 3,175,117 (“Kardos”).
EX1050	Intematix Introduces ChromaLit XT Remote Phosphor for High-Intensity LED Lighting, dated April 16, 2012.
EX1051	Intematix, ChromaLit XT 2012 Datasheet, dated November 5, 2012.
EX1052	Home Depot, Feit Electric 60-Watt Equivalent A15 Dimmable White Filament CEC Clear Glass E26 LED Ceiling Fan Light Bulb, True White 3500K (2-Pack).
EX1053	<i>Intentionally Omitted</i>
EX1054	Comparison of POPR-1357 and POR-1357
EX1055	Comparison of Schubert POPR-1357 and POR-1357 declarations

Exhibit	Description
EX1056	U.S. Patent No. 8,104,908 (“Harbers”).
EX1057	U.S. Patent No. 5,813,753 (“Vriens”).
EX1058	Jeong Rok Oh, et al., <i>Full down-conversion of amber-emitting phosphor-converted light-emitting diodes with powder phosphors and a long-wave pass filter</i> , Optics Express Vol. 18, Issue 11, pp. 11063-11072 (2010)
EX1059	U.S. Pat. Pub. No. 2007/0139949 (“Tanda”)
EX1060	U.S. Patent No. 9,310,030 (“Tong”).
EX1061	<i>Tinnus Enterprises, LLC v. Telebrands Corp.</i> , Brief for Intervenor, dated August 29, 2017, No. 17-1726 (Fed. Cir. 2017), Dkt. 39.
EX1062	<i>Tinnus Enterprises, LLC v. Telebrands Corp.</i> , Motion of Intervenor to Withdraw from Appeal, dated March 29, 2018, No. 17-1726 (Fed. Cir. 2017), Dkt. 72.
EX1063	Memorandum to Patent Trial and Appeal Board, dated January 6, 2021.
EX1064	US Provisional Patent Application Ser. No. 61/386,437 (“Tong”)
EX1065	Declaration of William A. Doolittle, Ph.D. Regarding Claims 11-14 Of The ‘678 Patent, dated October 3, 2025.
EX1066	<i>Feit Electric Co., Inc. v. LEDVANCE LLC</i> , No. 5:24-cv-31 (E.D. Ky. Feb. 2, 2024). Stayed April 2, 2025. <i>Id.</i> , Dkt. 63
EX1067	<i>Feit Electric Co., Inc. v. Savant Technologies LLC d/b/a GE Lighting</i> , No. 1:24-cv-473 (N.D. Ohio Mar. 13, 2024). Stayed April 1, 2025. <i>Id.</i> , text order
EX1068	<i>Feit Electric Co. Inc v. Elong International USA Inc., et al.</i> , No. 3:24-cv-1089 (N.D. Tex. May 6, 2024). Claim construction order issued July 2, 2025. (EX1044). Stayed November 21, 2025. <i>Id.</i> , Dkt. 164
EX1069	Website link to Ledvance Power Through Light Who We Aare and What this Means for Our Shareholders, available at https://perma.cc/VJ7U-XYE7 .
EX1070	Website Link to Salem State University, Archives and Special collections - Hygrade-Sylvania showing 1901 Massachusetts founding, available at https://perma.cc/NH6X-LF97 , dated April 4, 2023.

Exhibit	Description
EX1071	Ledvance Names Jonahtan Lubeck CEO of US Region. available at https://perma.cc/Y22R-6QL7 , dated November 9, 2022.
EX1072	<i>Feit Electric Co. v. LEDVANCE LLC</i> , No. 5:24-cv-00031 (E.D. Ky.), Dkt. 1, Complaint.
EX1073	Wikipedia page for Ledvance, available at https://perma.cc/3EP9-SP8H .
EX1074	Homepage for Ledvance.com, available at https://perma.cc/SNW9-33SE
EX1075	English-language Impressum listing Managing Directors and Munich Commercial Register HRB 220074, available at https://perma.cc/ET7N-MRNF
EX1076	MLS Co. Ltd. publicly traded on the Shenzhen Stock Exchange (ticker: 002745), available at https://perma.cc/7JEV-ETSD
EX1077	Mr. Qinghuan Sun biography, available at https://perma.cc/T62X-TY5K .
EX1078	Feit's Electric's LinkedIn, available at https://perma.cc/L76J-6V2S .
EX1079	Osram completes LEDvance sale to Chinese Consortium for €500 million (Updated), available at https://perma.cc/AS5C-BH6N .
EX1080	CFIUS Filing Clearance: Chinese Consortium and LEDvance, available at https://perma.cc/8DYL-8NVG , dated February 21, 2017.
EX1081	[News] MLS Plans to Acquire 18.77% Stake in BridgeLux from Epistar, available at https://perma.cc/LX9J-6M8E , dated July 14, 2025.
EX1082	Kaistar website, available at https://perma.cc/VNS3-8CGU .
EX1083	USPTO Assignment Records, Reel 060078, Frame 0465 (recorded June 2, 2022)
EX1084	Department of state: Division of Corporations – LEDvance LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on février 20, 2026 the foregoing was served
on counsel at the following electronic service addresses:

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