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Filed: February 20, 2026

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

DECLARATION OF ANDREW MARTIN IN SUPPORT OF PETITIONERS' OPPOSITION TO PO'S MOTION TO TERMINATE FOR ALLEGED FAILURE TO NAME A REAL PARTY IN INTEREST

I, Andrew Martin, hereby declare and state:

1. I am General Counsel for LEDVANCE LLC. I am also a registered patent attorney (Registration No. 45,413) and a former patent examiner at the United States Patent and Trademark Office. I have been employed by LEDVANCE LLC since approximately July 1, 2016, and have held my current position as LEDVANCE LLC's General Counsel for approximately 7 years. I submit this declaration in support of Petitioners' Opposition to Patent Owner's Motion to Terminate in IPR2024-01357 and IPR2025-00260. As a result of my employment, I have personal knowledge of the facts contained in this declaration.

2. LEDVANCE LLC is a Delaware limited liability company. EX1084.

3. LEDVANCE LLC's principal place of business and corporate headquarters are located in Wilmington, Massachusetts. *Id.*

4. LEDVANCE LLC is an operating company responsible for the design, purchase, importation, marketing, and sale of all lighting products sold by a LEDVANCE entity in the United States, and is the successor of SYLVANIA lighting, which has operated in the United States since 1901. EX1070 (https://perma.cc/NH6X-LF97)

5. LEDVANCE LLC is a subsidiary of LEDVANCE Holding LLC, a Delaware limited liability company. LEDVANCE Holding LLC is a subsidiary

of LEDVANCE GmbH, a German company headquartered in Garching, Germany. LEDVANCE GmbH is owned by MLS Co., Ltd. EX1073 (https://perma.cc/3EP9-SP8H).

6. MLS Co., Ltd. ("MLS") is a founder-controlled publicly traded Chinese company on the Shenzhen Stock Exchange (ticker: 002745). Qinghuan Sun, MLS's founder, holds approximately 40% of MLS's shares personally. EX1077 (https://perma.cc/T62X-TY5K, ISA biography of Qinghuan Sun, confirming founding of MLS in 1997 and role as Chairman/President).

7. Qinghuan Sun is one of LEDVANCE GmbH's Managing Directors. EX1074 (https://perma.cc/SNW9-33SE, LEDVANCE GmbH Impressum; *see also* EX1075 (https://perma.cc/ET7N-MRNF), English-language Impressum listing Managing Directors and Munich Commercial Register HRB 220074).

8. In connection with the acquisition of LEDVANCE GmbH by a consortium including MLS in 2016–2017, the transaction was submitted to the Committee on Foreign Investment in the United States (CFIUS) for review.

9. Yiwu State-Owned Assets Operation Center participated as a minority investor in the 2016–2017 consortium acquisition of LEDVANCE GmbH, and MLS subsequently acquired Yiwu's interest in March 2018. EX2041

10. CFIUS completed its review without imposing any conditions,

restrictions, or mitigation measures on the ownership structure or operations of LEDVANCE LLC.

11. MLS's ownership of LEDVANCE GmbH has been publicly known since 2017 in LEDVANCE GmbH's corporate materials and public announcements regarding the acquisition. (*See, e.g.,* EX2041).

12. LEDVANCE LLC operates independently from LEDVANCE GmbH and MLS.

13. LEDVANCE LLC has its own executive leadership team, its own management structure, and its own in-house legal function.

14. MLS does not have any officers or employees who serve as officers or employees of LEDVANCE LLC.

15. Qinghuan Sun does not hold any position at LEDVANCE LLC.

16. LEDVANCE LLC was sued by Feit Electric Company, Inc. for alleged infringement of U.S. Patent No. 8,604,678. EX1072 (Feit Electric Co. v. LEDVANCE LLC, No. 5:24-cv-00031 (E.D. Ky.), Complaint).

17. Neither LEDVANCE GmbH nor MLS was sued by the Patent Owner.

18. LEDVANCE LLC filed IPR2024-01357 to defend itself against those allegations.

19. The decision to file IPR2024-01357 was made by LEDVANCE

LLC.

20. The individuals involved in evaluating and authorizing the filing of IPR2024-01357 were limited to LEDVANCE LLC personnel and its retained counsel.

21. No employee, officer, director, or representative of LEDVANCE GmbH or MLS authorized, directed, or requested that LEDVANCE LLC file the petition in IPR2024-01357.

22. The preparation of the petition in IPR2024-01357 was handled by outside counsel retained by LEDVANCE LLC, working with me and Robert Clark, a registered patent attorney, former head of intellectual property at OSRAM SYLVANIA, and now a consultant to LEDVANCE LLC.

23. No employee or representative of LEDVANCE GmbH or MLS participated in drafting the petition.

24. No employee or representative of LEDVANCE GmbH or MLS reviewed drafts of the petition before it was filed.

25. LEDVANCE LLC does not utilize a centralized intellectual property department at the parent or ultimate parent level to manage its IP litigation.

26. Strategy decisions in this IPR, including decisions regarding grounds, prior art, expert selection, and litigation strategy, have been made by

LEDVANCE LLC in consultation with its outside counsel.

27. No employee or representative of LEDVANCE GmbH or MLS has exercised any supervisory authority or control over the conduct of this IPR.

28. LEDVANCE LLC's bank accounts are registered in Massachusetts and has paid all legal fees, expert fees, and costs associated with IPR2024-01357 from those bank accounts.

29. LEDVANCE LLC has not sought or received any reimbursement, funding, or financial support from LEDVANCE GmbH or MLS for any fees or costs associated with this IPR.

30. MLS played no role in the decision to file or prosecute this IPR and did not direct, control, encourage, require, or request that LEDVANCE LLC file this petition.

31. LEDVANCE GmbH likewise did not direct, control, encourage, require, or request the filing or prosecution of this IPR.

32. LEDVANCE LLC provides periodic updates to LEDVANCE GmbH regarding significant intellectual property litigation matters as part of routine corporate reporting.

33. LEDVANCE LLC is the entity accused of infringement of the '678 patent in the United States and has a direct commercial stake in the outcome of IPR2024-01357.

34. MLS is not accused of infringing the ’678 patent and has no direct exposure to liability in any U.S. litigation concerning that patent.

35. Any benefit to MLS from a favorable outcome in this IPR would be indirect and solely by virtue of corporate ownership, not because MLS authorized, funded, directed, or controlled this proceeding.

36. LEDVANCE LLC is not a petitioner in IPR2025-00260.

37. LEDVANCE LLC did not authorize, fund, or direct the filing of IPR2025-00260.

38. To my knowledge, MLS did not authorize, fund, or direct the filing of IPR2025-00260.

39. LEDVANCE LLC independently desired review of U.S. Patent No. 8,604,678, and independently authorized, funded, and directed the filing and prosecution of IPR2024-01357.

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

Executed in Wilmington, MA on this 20th day of February, 2026.

Andrew Martin