

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 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.

IPR2025-00260 (Patent 8,604,678 B2)

**PATENT OWNER'S MOTION FOR ADDITIONAL DISCOVERY
AND BRIEFING IN SUPPORT OF ITS MOTION TO TERMINATE
FOR FAILURE TO NAME A REAL PARTY IN INTEREST**

Mail Stop Patent Board
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
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PATENT OWNER’S EXHIBIT LIST

Exhibit No.	Description
2001	Declaration of E. Fred Schubert, Ph.D.
2002	<i>Curriculum vitae</i> for E. Fred Schubert, Ph.D.
2003	U.S. Patent Publication 2002/0180351 (“McNulty”)
2004	U.S. Patent Publication 2001/0000622 (“Reeh”)
2005	Scheduling Order (Dkt. 37), <i>Feit Electric Co., Inc. v. Elong International USA Inc.</i> , No. 3:24-cv-1089 (N.D. Tex.)
2006	June 2024 United States District Courts — Federal Court Management Statistics for N.D. Tex., E.D. Ky., and N.D. Ohio (https://www.uscourts.gov/statistics-reports/federal-courtmanagement-statistics-june-2024)
2007	Case Management Order (Dkt. 19), <i>Feit Electric Co., Inc. v. Savant Technologies LLC d/b/a GE Lighting</i> , No. 1:24-cv-473 (N.D. Ohio)
2008	Scheduling Order (Dkt. 33), <i>Feit Electric Co., Inc. v. Ledvance, LLC</i> , No. 5:24-cv-31 (E.D. Ky.)
2009	Savant’s Initial Invalidity and Unenforceability Contentions, <i>Feit Electric Co., Inc. v. Savant Technologies LLC d/b/a GE Lighting</i> , No. 1:24-cv-473 (N.D. Ohio), served on September 5, 2024
2010	Ledvance’s Initial Invalidity and Unenforceability Contentions, <i>Feit Electric Co., Inc. v. Ledvance, LLC</i> , No. 5:24-cv-31 (E.D. Ky.), served on September 24, 2024
2011	Elong’s Initial Invalidity and Unenforceability Contentions, <i>Feit Electric Co., Inc. v. Elong International USA Inc.</i> , No. 3:24-cv-1089 (N.D. Tex.), served on December 9, 2024
2012	Comparison of Petition and Expert Testimony Analysis
2013	Mike Krames, <i>Light-Emitting Diode Technology for Solid-State Lighting</i> , in <i>Frontiers of Engineering: Reports on Leading-Edge Engineering from the 2009 Symposium</i> , 67 (2009)
2014	E. Fred Schubert, <i>Light-Emitting Diodes</i> (2nd ed. 2006)
2015	Matthew G. Bevan & Bruce M. Romenesko, <i>Modern Electronic Packaging Technology</i> , 20 JOHNS HOPKINS APL TECH. DIGEST 22 (1999)
2016	X. A. Cao & S. D. Arthur, <i>High-power and reliable operation of vertical light-emitting diodes on bulk GaN</i> , 85 <i>Applied Physics Letters</i> 3971 (2004).
2017	Michael R. Krames et al., <i>Status and Future of High-Power Light-Emitting Diodes for Solid-State Lighting</i> , 3 <i>J. Display Tech.</i> 160 (2007)

Exhibit No.	Description
2018	Mehmet Arik et al., <i>Thermal Management of LEDs: Package to System</i> , 5187 Proc. SPIE 64 (2004)
2019	U.S. Dep't Energy, Critical Materials Strategy (Dec. 2010)
2020	Zongyuan Liu et al., <i>Measurement and numerical studies of optical properties of YAG:Ce phosphor for white light-emitting diode packaging</i> , 49 Applied Optics 247 (2010)
2021	March 2024 United States District Courts — Federal Court Management Statistics for N.D. Tex., E.D. Ky., and N.D. Ohio (https://www.uscourts.gov/data-news/reports/statisticalreports/federal-court-management-statistics/federal-courtmanagement-statistics-march-2024)
2022	September 2024 United States District Courts — Federal Court Management Statistics for N.D. Tex., E.D. Ky., and N.D. Ohio (https://www.uscourts.gov/data-news/reports/statisticalreports/federal-court-management-statistics/federal-courtmanagement-statistics-september-2024)
2023	Declaration of William A. Doolittle, Ph.D., dated November 6, 2024, <i>Feit Electric Company, Inc. v. Savant Technologies, d/b/a GE Lighting</i> , Case No. 24-cv-00473
2024	Rebuttal Declaration of William A. Doolittle, Ph.D., dated November 20, 2024, <i>Feit Electric Company, Inc. v. Savant Technologies, d/b/a GE Lighting</i> , Case No. 24-cv-00473
2025	Deposition Transcript of William A. Doolittle, Ph.D., dated June 10, 2025
2026	Declaration of E. Fred Schubert, Ph.D., dated June 25, 2025
2027	U.S. Provisional App. No. 61/427,411, filed on December 21, 2010
2028	U.S. Provisional App. No. 61/390,091, filed on October 5, 2010
2029	Home Depot - Feit Electric White Filament LED Light Bulbs listing
2030	Candle Power Forums article: Feit LED filament bulb with white filaments
2031	The Home Depot Announces 2024 Innovation Award Winners
2032	Feit Electric Lighting Instagram consumer comments regarding filaments
2033	Feit Electric Lighting Instagram consumer comments regarding yellow filaments
2034	Feit Electric Lighting Instagram consumer comments: Regular Yellow Filament vs. White Filament
2035	Home Depot White Filament price point of \$29.97
2036	Home Depot Yellow Filament price point of \$21.97
2037	Reddit: Do white filament LED edison bulbs exist?
2038	Deposition Transcript of William A. Doolittle, Ph.D., dated July 17, 2025

Exhibit No.	Description
2039	Declaration of E. Fred Schubert, Ph.D., dated July 25, 2025
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)

Exhibit No.	Description
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. LEDVANCE, LLC</i> , Case No. 5:24-00031 Dkt. 54-1 (E.D. Ky.)
2052	RESERVED
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, <i>available at</i> 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)
2057	About Ledvance, <i>available at</i> https://ledvance.com/en-us/company/about-ledvance (last accessed on February 6, 2026)

Exhibit No.	Description
2058	MLS Company Profile, <i>available at</i> https://www.led-mls.com/uploads/file/65e81abb9eb5f.pdf (last accessed on February 6, 2026)
2059	MLS Website – About Us – Our Team, <i>available at</i> https://www.led-mls.com/our-team.html (last accessed on February 6, 2026)
2060	MLS Website – About Us – Our Team, <i>available at</i> https://www.led-mls.com/our-team.html (last accessed on February 6, 2026)
2061	Feit Electric Company, Inc. Oral Argument Demonstratives

I. INTRODUCTION

Patent Owner Feit Electric Company, Inc. (“Feit Electric”) respectfully requests permission to serve additional discovery pursuant to Rule 42.51(b)(2) and a reply brief in support of its pending Motion to Terminate based on Failure to Disclose an RPI (Paper 57¹). Patent Owner brings this motion pursuant to authorization from the Board received during the March 26, 2026 teleconference (*see* Paper 66).

On January 30, 2026, the Board granted Patent Owner leave to file its now pending motion to terminate IPR2024-01357 based on Petitioner LEDVANCE LLC’s failure to disclose an RPI. Patent Owner filed the motion on February 6, 2026 (Paper 57). Petitioners filed an opposition on February 20, 2026 (Paper 58), including a declaration from Mr. Andrew Martin (Paper 59, the “Martin Declaration”), a corporate representative of Petitioner LEDVANCE LLC. The Martin Declaration adds new facts and evidence not previously addressed in Patent Owner’s motion.

As the Board confirmed during the recent Oral Argument, held on February 26, 2026, Patent Owner is entitled to cross examine Mr. Martin as part of routine discovery pursuant to Rule 42.51(b)(1)(ii). In connection with that cross

¹ Unless indicated otherwise, all docket citations refer to IPR2024-01357.

examination, Patent Owner seeks permission to do two things: (1) prior to the deposition, serve requests for production and requests for admission on Petitioner LEDVANCE LLC (attached hereto as Appendix A, the “Discovery Requests”); and (2) subsequent to the deposition, submit a reply to Paper 58. Patent Owner requests this additional discovery in the form of requests for production and requests for admission directed to: (1) unsupported statements that appear in Mr. Martin’s declaration, (2) non-public evidence in the possession, custody, or control of Ledvance LLC, which is not addressed in Mr. Martin’s declaration, and (3) admissions regarding relevant facts that Mr. Martin omitted from his declaration.

During the March 26, 2026 conference, the Board provided preliminary guidance to Patent Owner regarding its proposed written discovery and specifically noted that the initially proposed requests were too broad. *See* Paper 66. Patent Owner has tailored the attached requests for production based on the Board’s guidance. Patent Owner has also included requests for admission directed to facts that are particularly relevant to Patent Owner’s motion to terminate. The requests for admission ensure full disclosure to the extent Ledvance LLC is aware of information concerning these critical facts that may be beyond the personal knowledge of Mr. Martin.

II. ARGUMENT

The Board may, upon a motion by a party for good cause, authorize additional discovery of evidence directly related to the factual assertions advanced in the proceeding. *See* 37 C.F.R. § 42.51(b)(2). The Board has identified five discovery factors that are important to address when a party requests additional discovery: (i) more than a possibility and mere allegation; (ii) litigation positions and underlying basis; (iii) ability to generate equivalent information by other means; (iv) easily understandable instructions; and (v) requests not overly burdensome to answer. *See Garmin Int’l, Inc. et al. v. Cuozzo Speed Techs. LLC*, Case IPR2012-00001, Paper 20 at *6-7 (PTAB Feb. 14, 2013) (“*Garmin*”). Patent Owner addresses each of the *Garmin* factors below.

Patent Owner also addresses the particular relevance of the requested information in view of the Director’s recent guidance on the mandatory disclosure of *all* real parties in interest, including in the Director’s Memorandum of October 28, 2025,² and the Director’s decision in *Yangtze Memory Technologies Co., Ltd. v.*

² October 28, 2025 Memorandum from Director John A. Squires, “Precedential designation of *Corning Optical Communications RF, LLC v. PPC Broadband Inc.*, IPR2014-00440, Paper 68 (PTAB Aug. 18, 2015) (“*Corning Optical*”) (except for § II.E.1).” (“Director’s Memorandum”).

Micron Technology, Inc., IPR2025-000098, IPR2025-000099, Paper 38 (PTAB Jan. 15, 2026) (“*YMTC*”).

A. Each of the *Garmin* Factors Supports the Proposed Discovery

1. More than a possibility and mere allegation

Factor 1 indicates that the party requesting discovery should cite evidence tending to show beyond speculation that in fact something useful will be uncovered by the requested discovery. *See Garmin* at 6. Here, Mr. Martin’s Declaration suggests that Ledvance LLC is in possession of all information sought as part of the Requests for Production. For example, Mr. Martin discusses the relationship between Ledvance LLC, Ledvance Holdings LLC, Ledvance GmbH, and MLS Co., Ltd. and the sale of Ledvance GmbH to MLS Co., Ltd. Martin Decl., ¶¶ 2-10. Request for Production Nos. 1-4 and 6 seek internal documents showing the ownership structure of these entities and agreements between them. Mr. Martin also references the relationship between Ledvance LLC and its affiliates as it relates to litigation. Martin Decl., ¶ 32. Mr. Martin also indicates that the acquisition of LEDVANCE GmbH required submissions to and reports from the Committee on Foreign Investment in the United States (“CFIUS”). Martin Decl., ¶¶ 8, 10. Request for Production No. 5 seeks these documents. Request for Production No. 7 seeks instances where Ledvance LLC has shared

counsel with its affiliates³. Finally, each of the requests for admission seek information that Ledvance LLC has in its possession.

2. Litigation positions and underlying basis

Factor 2 prohibits a party from seeking additional discovery directed to the opposing party's litigation positions or underlying basis. *See Garmin* at 6. None of the Discovery Requests seeks Ledvance LLC's litigation positions. Each is directed to documents in Ledvance LLC's possession that relate to statements made by Mr. Martin in his declaration or knowledge unique to Ledvance LLC.

³ Based on its searches, Patent Owner has identified at least four proceedings in which a single law firm has jointly represented both LEDVANCE LLC and MLS Co., Ltd. (*Lighting Science Grp. Corp. v. MLS Co., Ltd.*, D. Del. Case No. 19-cv-00798; *Certain Light-Emitting Diode Products, Systems, and Components Thereof (I)*, USITC Inv. No. 337-TA-1163; *Certain Light-Emitting Diode Products, Systems, and Components Thereof (II)*, USITC Inv. No. 337-TA-1164; *Certain Light-Emitting Diode Products, Systems, and Components Thereof (III)*, USITC Inv. No. 1168). Request For Production No. 7 seeks identification of any other instances, including non-public instances in which they have shared counsel.

3. Ability to generate equivalent information by other means

Factor 3 requires that the discovery sought be information that a party cannot reasonably figure out or assemble without a discovery request. *See Garmin* at 6. Each of the Discovery Requests is directed to non-public information that is internal to Petitioner Ledvance LLC. For example, Request for Production Nos. 1-4, and 6 seek internal documents showing the ownership structure of Ledvance LLC and affiliated entities. Request for Production No. 5 seeks reports and other submissions between Petitioner and the U.S. Committee on Foreign Investment in the United States. And Request for Production No. 7 seeks identification of instances where Petitioner has shared counsel with MLS Co. Ltd. Beyond the document requests, the requests for admission seek information known to Ledvance LLC.

4. Easily understandable instructions

Factor 4 concerns easily understandable instructions. In total, the definitions and instructions associated with the Discovery Requests span less than two pages. *C.f. Garmin* at 14. The definitions are provided to clarify the use of certain defined terms throughout the Discovery Requests, and the instructions merely require the Petitioner to furnish responses and documents and to describe any instances where Petitioner cannot do so (either because such information is privileged or otherwise).

5. Requests not overly burdensome

Factor 5 concerns the burden of responding to the Discovery Request. Similar to Factor 1, Petitioner will not be unduly burdened as it has already conducted much of the necessary searching in preparation of Mr. Martin's Declaration. For example, Mr. Martin discusses the relationship between Ledvance LLC, Ledvance Holdings LLC, Ledvance GmbH, and MLS Co., Ltd. and the sale of Ledvance GmbH to MLS Co., Ltd. Martin Decl., ¶¶ 2-10. Request for Production Nos. 1-4 and 6 seek internal documents showing the ownership structure of these entities and agreements between them. Mr. Martin also indicates that the acquisition of LEDVANCE GmbH required submissions to and reports from the Committee on Foreign Investment in the United States. Martin Decl., ¶¶ 8, 10. Request for Production No. 5 seeks these documents. Mr. Martin also references the relationship between Ledvance LLC and its affiliates as it relates to litigation. Martin Decl., ¶ 32. Request for Production No. 7 seeks instances where Ledvance LLC has shared counsel with its affiliates. Beyond the document requests, the requests for admission seek information that is known to Ledvance LLC.

B. The Proposed Discovery Is Relevant to the Present Dispute

As discussed in Patent Owner's motion to terminate (Paper 57), on October 28, 2025, the Director's Memorandum *requires* all Petitioners to identify *all* real

parties in interest in an IPR petition. Director's Memorandum. The Director's Memorandum designated as precedential the *Corning Optical* case, which addressed a petitioner's failure to name its own interested corporate affiliates as real parties in interest. Here, each of Patent Owner's proposed Request for Production Nos. 1-7 is directed to the same types of relationships between and among Ledvance LLC and its corporate affiliates, as are Request for Admission Nos. 1-8 and 11-12.

The Director's Memorandum placed particular emphasis on concerns of exploitation by foreign state-backed actors. In *YMTC*, the Director provided guidance on types of additional evidence that are relevant in these scenarios. The *YMTC* decision identifies multiple types of information that are properly the subject of additional discovery, including articles explaining that the foreign government sets policy for Petitioner's industry within its borders and articles explaining that the foreign government has an interest in Petitioner through ownership in Petitioner's parent corporation. *See YMTC* at 6. Here, each of Patent Owner's proposed Request for Production Nos. 2, 3, and 5 is directed to the same types of connections to Chinese state-owned entities, as are Request for Admission Nos. 9-10.

For all of these reasons, Patent Owner's proposed Request for Production Nos. 1-7 and Request for Admission Nos. 1-12 are directly relevant to issues at the

core of the Director’s recent guidance on the obligation of all petitioners to identify *all* real parties in interest in the petition.

C. Patent Owner Requests Permission to File a Reply Brief to Address the New Facts and Evidence Presented in the New Declaration of Mr. Andrew Martin

The new Martin Declaration presents a lengthy list of alleged new facts and evidence, none of which finds documentary support in the record. As explained above, Patent Owner’s proposed Discovery Requests are tailored to probe the details underlying the Martin Declaration, and Patent Owner intends to cross examine Mr. Martin to further explore the details of his declaration. Once that discovery is complete, Patent Owner requests permission to file a reply brief addressing all of these topics so that the Board may make a decision on this important issue fully informed by a complete record.

III. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that the Board grant it permission to serve the attached document requests on Petitioner LEDVANCE LLC and submit a reply to Paper 58 upon completion of Petitioner’s response to the document requests and Mr. Andrew Martin’s Declaration.

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

Date: April 3, 2026

Respectfully submitted,

/Charles M. McMahon/

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Appendix A

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAVANT TECHNOLOGIES LLC d/b/a GE LIGHTING and
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U.S. Patent No. 8,604,678

SAVANT TECHNOLOGIES LLC d/b/a GE LIGHTING,
ELONG INTERNATIONAL USA INC., and
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FEIT ELECTRIC COMPANY, INC.,
Patent Owner.

IPR2025-00260
U.S. Patent No. 8,604,678

**FEIT ELECTRIC COMPANY, INC.'S FIRST
REQUEST FOR DISCOVERY TO PETITIONER LEDVANCE LLC**

Patent Owner Feit Electric Company, Inc. (“Feit Electric”) requests that Petitioner LEDVANCE LLC respond to the following requests for production and requests for admission in accordance with the following instructions and definitions.

DEFINITIONS

1. “Petitioner,” “LEDVANCE LLC,” “You,” or “Your,” means Petitioner LEDVANCE LLC.

2. “Affiliate” means any entity directly or indirectly owned or controlled by, any person who directly or indirectly owns or controls, or any entity which directly or indirectly is under common ownership or control with the relevant entity.

3. “’678 Patent” means U.S. Patent No. 8,604,678.

4. “Relevant Industry” means any technologies relating to LED lighting products.

5. “Relating to,” “relate to,” “referring to” and “refer to” mean relating to, reflecting, referring to, concerning, mentioning, pertaining to, evidencing, involving, describing, discussing, commenting on, embodying, responding to, supporting, contradicting, or constituting (in whole or in part), as the context makes appropriate.

6. “Include” and “including” means including without limitation.

7. “Or” and “and” shall be read in the conjunctive and in the disjunctive wherever they appear, and neither of these words shall be interpreted to limit the scope of these Interrogatories.

8. Use of the singular shall be read as including the plural and vice-versa.
9. Use of a verb in any tense shall be construed as the use of the verb in all other tenses.

INSTRUCTIONS

The following instructions shall apply to each of the document requests herein:

1. Answer each of the following requests in writing, and produce all documents and things requested therein.
2. In answering the following requests for production, furnish all available documents and things, within your possession, custody, or control (including indirect control). If You cannot fully respond to the following requests after exercising due diligence to secure the documents requested thereby, so state, and specify the portion of each request that cannot be responded to fully and completely.
3. If any documents and/or things requested are claimed to be privileged or otherwise immune from discovery, please provide all documents and things falling within the scope of the request for production that are not privileged, and for each document or thing to which a claim of privilege is made, identify such document or thing with sufficient particularity.
4. To the extent You deny any request for admission, please explain the basis for your denial.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Identify and produce corporate organizational charts showing from 2020 onward the full ownership chain of LEDVANCE LLC up through its ultimate parent entity or entities, including all Affiliates, and all intermediate holding entities, including percentage ownership at each level.

REQUEST FOR PRODUCTION NO. 2:

Identify and produce documents sufficient to show changes in ownership or capitalization of (1) LEDVANCE LLC, (2) LEDVANCE Holding LLC, (3) LEDVANCE GmbH, and (4) MLS Co., Ltd., including capital contributions by government-linked entities, convertible instruments, or special share classes held by government actors (*e.g.*, “golden shares”).

REQUEST FOR PRODUCTION NO. 3:

Identify and produce documents sufficient to identify any foreign-government or foreign-government owned entities that have or have had since 2015 any ownership in LEDVANCE LLC, LEDVANCE Holdings LLC, LEDVANCE GmbH, or MLS Co., Ltd., including the percentage ownership.

REQUEST FOR PRODUCTION NO. 4:

Identify and produce any agreements between LEDVANCE LLC and/or any Affiliate(s) thereof regarding the supply, sale, and/or importation of goods in the

Relevant Industry. Include in your production all agreements governing the relationship between or among LEDVANCE LLC and LEDVANCE Holdings LLC, LEDVANCE GmbH, and MLS Co., Ltd., as well as all patent or trademark license agreements between or among LEDVANCE LLC and LEDVANCE Holdings LLC, LEDVANCE GmbH, and MLS Co., Ltd.

REQUEST FOR PRODUCTION NO. 5:

Identify and produce including any conditions, mitigation agreements, or national security assessments issued or mandated by CFIUS (Committee on Foreign Investment in the United States) relating to the acquisition by MLS Co., Ltd. of LEDVANCE LLC (or any direct or indirect parent entity thereof). Include in your production those transaction documents submitted to and/or received from CFIUS that are referenced in the Declaration of Andrew Martin (Paper 59) at paragraphs 8 and 10.

REQUEST FOR PRODUCTION NO. 6:

Identify and produce all regulatory filings or reports submitted since 2020 by LEDVANCE LLC or any Affiliate thereof to any government agency that describe the ownership or operational relationship between MLS Co., Ltd. and LEDVANCE LLC or LEDVANCE GmbH, including any benefits that LEDVANCE LLC or LEDVANCE GmbH provide to MLS Co. Ltd. (*e.g.*, access to distribution channels in the United States).

REQUEST FOR PRODUCTION NO. 7:

Identify and produce documents sufficient to identify all instances in which LEDVANCE LLC, LEDVANCE GmbH, and/or MLS Co. Ltd. have shared legal counsel in this or any other proceeding before any U.S. court or administrative agency. For purposes of this request, “shared counsel” means that two or more of the entities listed above having engaged, been represented by, or paid (directly or indirectly) the same legal counsel in the same proceeding.

REQUESTS FOR ADMISSION**REQUEST FOR ADMISSION NO. 1:**

Admit that MLS Co. Ltd. controls the selection of members of the board of directors for LEDVANCE GmbH.

REQUEST FOR ADMISSION NO. 2:

Admit that MLS Co. Ltd. controls the selection of members of the board of directors for LEDVANCE LLC.

REQUEST FOR ADMISSION NO. 3:

Admit that MLS Co. Ltd. nominates new members of the board of directors for LEDVANCE GmbH.

REQUEST FOR ADMISSION NO. 4:

Admit that MLS Co. Ltd. nominates new members of the board of directors for LEDVANCE LLC.

REQUEST FOR ADMISSION NO. 5:

Admit that MLS Co. Ltd., after acquiring ownership of LEDVANCE GmbH, reorganized the board of directors for LEDVANCE GmbH.

REQUEST FOR ADMISSION NO. 6:

Admit that MLS Co. Ltd., after acquiring ownership of LEDVANCE LLC, reorganized the board of directors for LEDVANCE LLC.

REQUEST FOR ADMISSION NO. 7:

Admit that MLS Co. Ltd., after acquiring ownership of LEDVANCE GmbH, urged then-existing members of the board of directors for LEDVANCE GmbH to resign.

REQUEST FOR ADMISSION NO. 8:

Admit that MLS Co. Ltd., after acquiring ownership of LEDVANCE LLC, urged then-existing members of the board of directors for LEDVANCE LLC to resign.

REQUEST FOR ADMISSION NO. 9:

Admit that Yiwu State-Owned Assets Operation Center, either directly or indirectly, owns a portion of MLS Co. Ltd.

REQUEST FOR ADMISSION NO. 10:

Admit that Yiwu State-owned Assets Operation Center, either directly or indirectly, owns a portion of LEDVANCE LLC.

REQUEST FOR ADMISSION NO. 11:

Admit that MLS Co. Ltd. and Shenzhen Mulinsen Technology Co., Ltd. are the same company.

REQUEST FOR ADMISSION NO. 12:

Admit that MLS Co. Ltd. is an Affiliate of Shenzhen Mulinsen Technology Co. Ltd.

CERTIFICATE OF PAGE COUNT

I, the undersigned, do hereby certify that the foregoing Patent Owner's Motion to Terminate for Failure to Name a Real Party in Interest contains under 10 pages, as specified by the Board during the March 26, 2026 conference call (*see* Paper 66).

/Charles M. McMahon/

Charles M. McMahon

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2026, a true and correct copy of the foregoing was served by electronic mail upon the following counsel of record for

Petitioners:

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