

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 FOR ADDITIONAL DISCOVERY**

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<i>Wi-Fi One, LLC v. Broadcom Corp.</i> , 878 F.3d 1364 (Fed. Cir. 2018) (<i>en banc</i>)	2
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I. INTRODUCTION

Despite being warned that “[a]ny request for additional discovery must be justified under the factors articulated in *Garmin*,” Paper 66 at 2, PO failed to do so.

PO ignores *Garmin*’s holding that, because additional discovery is limited to “‘what is otherwise necessary in the interest of justice’ . . . , [it] is significantly different from the scope of discovery generally available under the Federal Rules of Civil Procedure.” *Garmin Int’l, Inc. v. Cuozzo Speed Techs., LLC*, IPR2012-00001, Paper 26 at 5 (PTAB Mar. 5, 2013) (precedential) (quoting 35 U.S.C. § 316(a)(5)). PO presents broad requests without any explanation, let alone evidence, that the discovery sought would be “useful”—that is, not “merely ‘relevant’,” but “favorable in substantive value to a contention.” *Id.* at 7.

PO seeks after-the-fact document discovery and requests for admission to support its *already-briefed* motion to terminate. The requests target corporate affiliation between LEDVANCE LLC and MLS Co., Ltd.—which is undisputed—not whether MLS directed this IPR. Mr. Martin has addressed that question under oath. Paper 59.

PO waited until after the oral hearing, with both merits and motion briefing complete and argued, to seek authorization for this motion. It still has not noticed Mr. Martin’s deposition, available as routine discovery since February 20. Far from being “necessary in the interest of justice,” PO’s requested discovery would

only serve to “cause unnecessary delay [and] an unnecessary increase in the cost of the proceeding.” 35 U.S.C. § 316(a)(6). PO’s motion should be denied.

II. ARGUMENT

A. PO’s underlying motion to terminate is futile

PO’s requested discovery cannot be “useful” to a motion to terminate that cannot succeed.

1. The Director has reserved his discretion over real party-in-interest determinations

As a threshold matter, the panel lacks authority to grant PO’s motion to terminate. The Director has reserved to himself the discretionary determination of whether a proceeding should be terminated for failure to name a real party in interest. In *Wi-Fi One*, the *en banc* Federal Circuit confirmed that the Director has discretion over the naming of RPIs.” *Wi-Fi One, LLC v. Broadcom Corp.*, 878 F.3d 1364, 1374 n.9 (Fed. Cir. 2018) (*en banc*) (citing with approval *Lumentum Holdings, Inc. v. Capella Photonics, Inc.*, IPR2015-00739, Paper 38 at 4-5 (PTAB Mar. 4, 2016) (precedential)). Until recently, that discretion was exercised by panels. *See, e.g., Corning Optical Commc’ns RF, LLC v. PPC Broadband, Inc.*, IPR2014-00440, Paper 68 (PTAB Aug. 18, 2015). On October 17, 2025, the Director revoked that delegation and consolidated discretionary authority—including “real party in interest determination[s]”—in himself, unless he elects to refer a particular issue to the PTAB for detailed treatment. *Director Institution of*

AIA Trial Proceedings at 2. On October 28, 2025, the Director exercised that discretion to “restore the Office’s pre-*SharkNinja* practice of requiring petitioners to identify the real parties in interest (‘RPIs’) to their petitions before institution.”

Precedential Designation of Corning Optical at 1. In *Tianma*, the Director confirmed that implementation of the Memorandum was an “exercise of discretion,” explaining that “the integrity of PTAB proceedings depends on knowing who is behind a petition—who funds it, directs it, and/or benefits from it.” IPR2025-01579, Paper 12 at 7 (Dir. Mar. 18, 2026) (precedential). On March 27, 2026, the Director confirmed that panels lack authority over discretionary determinations. *See* Paper 69 at 8 (citing *Berkshire Hathaway Energy Co. v. Birchtech Corp.*, IPR2025-00274, Paper 81 at 3 (Dir. Mar. 27, 2026)). This panel has already applied that framework, denying PO’s parallel claim construction motion to terminate on the same basis. Paper 69 at 8. PO’s RPI motion seeks the same species of discretionary relief and should be denied for the same reason.

The Director would have good reason to deny PO’s motion. The Director has already declined PO’s first attempt to raise this issue after reclaiming discretionary authority. *See* EX3100; EX3101 (denying Director Review request). Allowing RPI to be raised for the first time ***more than a year after institution*** would create a perverse incentive: rather than raising RPI issues early, patent owners would have every reason to wait until the end of the proceeding, when they

have a better view of the merits and, more importantly, when correction is no longer possible. Moreover, with the denial of PO’s claim construction motion to terminate (Paper 69), there is nothing preventing IPR2025-00260 from proceeding to a final written decision.¹ Both proceedings present the same challenge to independent claim 1. Resolution of IPR2025-00260 would effectively resolve the challenged claims in IPR2024-01357 as well. The Office has a strong interest in resolving the patentability of the dependent claims rather than leaving them enforceable for the district court to address. *See Cuozzo Speed Techs., LLC v. Lee*, 579 U.S. 261, 279 (2016) (the public has a “paramount interest in seeing that patent monopolies . . . are kept within their legitimate scope”).

2. PO has no basis to dispute Mr. Martin’s testimony

Board precedent requires a petitioner facing an RPI challenge to provide evidence establishing who authorized, funded, and directed the petition. *See Corning Optical*, Mot.; *Tianma*, Paper 12 at 10. Mr. Martin’s declaration satisfies that standard. He testified under oath that LEDVANCE LLC—not MLS—decided to file this IPR (¶ 19), that MLS authorized no part of the filing (¶ 21), that

¹ The statutory deadline in IPR2024-01357 is September 5, 2026. Paper 33. The statutory deadline in IPR2025-00260 appears to still be June 23, 2026. *But see* Paper 25 at 9 (adopting -01357 schedule for both proceedings).

LEDVANCE LLC's Massachusetts bank accounts paid all fees (§ 28), that Mr. Sun is a Managing Director of LEDVANCE GmbH and holds no position at LEDVANCE LLC (§§ 7, 15), and that LEDVANCE LLC independently authorized, funded, and directed this proceeding (§ 39). Paper 59. PO's claim that Mr. Martin's testimony presents facts "none of which finds documentary support in the record" (Mot. at 9) is plainly false: Mr. Martin provided detailed information about each corporate relationship and the filing of these IPRs **and** cited to documents supporting his testimony. *Id.* LEDVANCE also voluntarily produces a complete corporate organizational chart confirming that testimony. EX1091.

PO does not identify a single fact in the declaration it expects to contradict through discovery. It still has not formally requested Mr. Martin's deposition—available as routine discovery since February 20—to test any of his testimony. PO has had the underlying corporate-ownership facts since at least 2020, when LEDVANCE LLC identified its corporate parents in proceedings where PO was an interested party. *See* EX1094. Yet PO did not raise RPI until November 2025—five months before this motion for discovery. EX3100. On December 4, 2025, PO represented to Petitioners that it did "not intend to rely upon any additional discovery in support of" its motions to terminate. EX1088. PO changed course only after LEDVANCE's opposition completely refuted its contentions.

Even if there were reason to reopen the record, there is no time to do so. An

RPI discovery cycle takes months—around 4.5 months in *Corning Optical* (IPR2014-00440, Papers 44, 68), 10 months in *TikTok* (IPR2024-00757, Papers 34, 42), and 10 months in *GEA v. Steuben* (IPR2014-00041, Papers 19, 140)—and the Final Written Decision here is due in less than five months. *Supra* n.1. That time pressure is entirely of PO’s making—sixteen months elapsed between PO’s first opportunity to raise RPI (the December 2024 POPR) and PO’s motion for discovery (April 2026), during which PO filed a motion without evidence, received an opposition it could not answer, and only then sought the discovery it now seeks.

B. PO’s requests are not justified under *Garmin*

As an initial matter, PO applies the wrong standard, citing the PGR’s “good cause” threshold rather than the IPR’s “necessary in the interest of justice.” Mot. at 3; 35 U.S.C. § 316(a)(5). PO also fails to apply the holding of *Garmin*.

1. PO’s requests for documents fail *Garmin*

Factor 1: the requested documents would not be useful

To be “useful” under *Garmin*, discovery must produce evidence of actual control over this specific IPR—not just corporate affinity. *Worlds Inc. v. Bungie, Inc.*, 903 F.3d 1237, 1244 (Fed. Cir. 2018); *Par Pharm., Inc. v. Horizon Therapeutics, Inc.*, IPR2015-01117, Paper 13 at 10 (PTAB Nov. 4, 2015). The entirety of PO’s Factor 1 showing for its document requests is that “Mr. Martin’s Declaration suggests that Ledvance LLC is in possession of all information sought

as part of the Requests for Production.” Mot. at 4. That is merely an allegation that documents exist. It is not a showing that they would be useful.

PO’s requests target the wrong question. PO tells the Board what it hopes to find: “documents showing the ownership structure” (Mot. at 4), “non-public evidence in the possession, custody, or control of Ledvance LLC, which is not addressed in Mr. Martin’s declaration” (*id.* at 2), and “admissions regarding relevant facts that Mr. Martin omitted” (*id.*). PO admits that these document and admission requests are not related to Mr. Martin’s declaration and, importantly, none relate to who directed, funded, or paid for this IPR (Mot. at 2)—the questions *Corning Optical*’s patent owner actually asked, and the questions whose answers led to termination. PO’s requests ask none of those questions because Mr. Martin’s declaration already definitively answers them. Paper 59 ¶¶ 19, 21, 22, 28. Even assuming every request produced exactly what PO describes, PO would have more evidence of corporate affiliation—which is already undisputed—and no evidence that MLS directed, funded, or controlled this proceeding. *Compare* Paper 59 (cogent testimony from LEDVANCE LLC’s General Counsel) *with* Paper 67 at 33 (PO: Mr. Martin “hardly seems credible”) *and* Mot. at 9 (PO “intends to . . . explore the details”); *see also* *CaptionCall*, IPR2015-00636, Paper 42 at 17-18.

Factor 3: the information sought is equally available to PO

PO has routine cross-examination of Mr. Martin and has not used it. The

corporate-affiliation information PO seeks is publicly available, for example, from MLS's Shenzhen Stock Exchange filings. EX1092; *see also* EX2049; EX2050.

Factors 4 and 5: the requests are exceptionally broad

PO's definition of "relating to" uses fourteen verbs. Mot., App'x A. Its "Instructions" seek materials in LEDVANCE LLC's "possession, custody, or control, (including indirect control)"—with "indirect control" undefined. Several of PO's requests name MLS Co., Ltd., LEDVANCE GmbH, and LEDVANCE Holding LLC directly as entities whose documents must be produced.

PO *expanded*, not narrowed, its requests after the Board told it to scale back. The Board found PO's original 27 requests "too broad" and directed PO to "propose more narrowly tailored requests." Paper 66 at 2. PO dropped to 7 RFPs—but added 12 entirely new Requests for Admission. RFP 4 was broadened: it dropped a foreign-government-policy qualifier and added "all agreements governing the relationship" plus all patent and trademark licenses, unlimited in time. RFP 6 broadened "foreign government agency" to "any government agency." The "narrowing" was cosmetic.

2. PO's requests for admission fail *Garmin*

Factor 1: the requested information would not be useful

PO's Factor 1 showing for the RFAs is no better: "each of the requests for admission seek information that Ledvance LLC has in its possession." Mot. at 5. A

conclusory statement that LEDVANCE LLC possesses the information sought is not a *Garmin* showing. Even where the RFAs mention LEDVANCE LLC, they ask about board selection, nomination, and reorganization—ordinary corporate governance, not authorization, funding, or direction of this IPR. Mr. Martin has already addressed LEDVANCE LLC’s governance. Paper 59 ¶¶ 11-22. PO’s own brief admits the RFAs seek information “beyond the personal knowledge” of Mr. Martin—an admission that the RFAs target facts outside Mr. Martin’s declaration.

Factor 2: PO seeks litigation positions

PO’s RFAs seek to develop facts for the reply brief PO simultaneously requests. Instruction 4 compounds the problem: “To the extent You deny any request for admission, please explain the basis for your denial.” Mot., App’x A. That converts every denial into an interrogatory—a vehicle “typically not be permitted” by the Board. CTPG at 26 (Nov. 2019). And the Board’s rules already provide the mechanism PO seeks. Had PO included a statement of material facts in its motion, Petitioners’ would have been required to admit, deny, or state it could not admit or deny each fact—and any material fact not specifically denied could have been deemed admitted. 37 C.F.R. § 42.23(a). PO chose not to use the rule and cannot now seek the same relief through post-opposition RFAs. *Garmin*, Paper 26 at 6 (“There is a proper time and place for each party to make its presentation.”).

C. PO has not justified additional briefing

PO anticipated reply briefing in December 2025 and chose not to request it. On December 4, PO proposed to Petitioners “two weeks for reply briefing.” EX1088 at 1. At the January 30 conference, PO did not request reply briefing, and the Board authorized motion and opposition only. Paper 66; *see also* Paper 67 at 62-63 (PO instructed to “do the deposition first”). And the Martin Declaration is exactly the evidence LEDVANCE said it anticipated at the January 30 conference, not a “late breaking” surprise justifying a reply PO already declined. *See Sandoz Inc. v. AbbVie Biotech. Ltd.*, IPR2017-01824, Paper 13 (PTAB Dec. 15, 2017).

PO’s motion asks the Board to authorize discovery in the hope that it will reveal documents that enable a deposition that yields testimony that justifies a reply brief that includes an argument PO has not yet identified—all in service of a motion that is already fully briefed and argued, that the panel may lack authority to grant, that would terminate only one of two consolidated proceedings challenging patentably indistinct claims, and that the Director has twice rejected as untimely.

III. CONCLUSION

PO’s motion for additional discovery should be denied., PO’s motion to terminate should also be denied on the existing record, and these consolidated proceedings should proceed to a final written decision on the merits.

Date: April 17, 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.
EX1039	<i>Feit v. Elong</i> , Plaintiff’s Disclosure of Asserted Claims and Preliminary Infringement Contentions, No. 3:24-cv-1089 (N.D.

Exhibit	Description
	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
EX1056	U.S. Patent No. 8,104,908 (“Harbers”).

Exhibit	Description
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.
EX1071	Ledvance Names Jonahtan Lubeck CEO of US Region. available at https://perma.cc/Y22R-6QL7 , dated November 9,

Exhibit	Description
	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
EX1085	<i>Feit Electric Co., Inc. v. LEDVANCE LLC</i> , No. 5:24-cv-31 (E.D. Ky.), Dkt. 67, Defendant's Stipulation regarding claim construction and indefiniteness dated March 3, 2026.
EX1086	<i>Feit Electric Co., Inc. v. Savant Technologies LLC d/b/a GE Lighting</i> , No. 1:24-cv-473 (N.D. Ohio), Dkt. 50, Defendant's Stipulation regarding claim construction and indefiniteness, dated March 3, 2026.

Exhibit	Description
EX1087	<i>Feit Electric Co. Inc v. Elong International USA Inc., et al.</i> , No. 3:24-cv-1089 (N.D. Tex), Dkt. 168, Order of Dismissal, dated January 30, 2026.
EX1088	Correspondence between Counsel for Patent Owner and Petitioner, dated December 2-4, 2025.
EX1089	Correspondence between Counsel for Patent Owner and Petitioner, dated December 8, 2025 through January 26, 2026.
EX1090	Correspondence between Counsel for Patent Owner and Petitioner, dated February 27, 2026 through March 20, 2026.
EX1091	FILED UNDER SEAL – Ledvance – Legal Structure Shareholding as of January 31, 2026
EX1092	MLS 2025 Semi-Annual Report
EX1093	<i>Intentionally Omitted</i>
EX1094	<i>Cao Lighting, Inc. v. OSRAM Sylvania Inc., and LEDVANCE LLC</i> , Case No. 20-690 (MN) (DED), Defendant Ledvance LLC’s Rule 7.1 Statement, dated Aug. 18, 2020.

CERTIFICATE OF SERVICE

The undersigned certifies that on April 17, 2026 the foregoing was served
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