

Subject: Re: IPR2024-01357 and IPR2025-00260: Draft Message to Board
Date: Monday, January 26, 2026 at 10:59:11 AM Eastern Standard Time
From: Andrew Brown
To: McMahon, Charles
CC: David Radulescu, Etai Lahav, Savant_IPR_Service, FeitElectricIPR
Attachments: image479735.jpg

Charlie, we are available Wednesday, Thursday, or Friday this week. Thanks.

212-713-0356
andy@radip.com

From: McMahon, Charles <CMcMahon@beneschlaw.com>
Date: Friday, January 23, 2026 at 3:42 PM
To: Andrew Brown <andy@radip.com>
Cc: David Radulescu <david@radip.com>, Etai Lahav <etai@radip.com>, Savant_IPR_Service <Savant_IPR_Service@radip.com>, FeitElectricIPR <FeitElectricIPR@beneschlaw.com>
Subject: Re: IPR2024-01357 and IPR2025-00260: Draft Message to Board

Andy,

Thanks for providing your position, and apologies for the delay in getting back to you. I was in trial.

We will plan to include your insert below, although we note that it is a bit argumentative.

When are you available next week for a call with the Board?

Best regards,
Charlie



Charles M. McMahon
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On Jan 8, 2026, at 09:38, Andrew Brown <andy@radip.com> wrote:

Charlie, thanks for your patience as we coordinated with our clients over the holidays. Below are Petitioners' positions. Thanks.

--

With respect to indefiniteness, Petitioners oppose PO's request because the record on indefiniteness is complete. The District Court construed "improves an off-state white appearance"

to mean “causes an observer to conclude that a wavelength conversion component has more of a white appearance in an off state.” EX1044. The Board’s Preliminary Guidance adopted this construction and confirmed that “the claims ... do not require quantification of the improvement.” Paper 42 at 20 (citing EX1044 at 7). Both the Petition and Opposition to the Motions to Amend applied this plain meaning construction consistently. See Paper 41 at 1 (“Petitioners do not contest [the District Court’s] plain meaning construction[.]”). While determining the bounds of “improves an off-state white appearance” is necessary to assess infringement, the prior art discloses such an improvement in the very same words. Indeed, the indefiniteness of the plain meaning construction was raised in the Opposition to the MTAs to ensure consistency with the district court proceeding.

With respect to any alleged RPI of Petitioner LEDVANCE, PO's dispute relates only to Petitioner LEDVANCE. As such, Petitioners Savant, Elong, and Longstar oppose PO's request as inappropriately treating all petitioners of record as a single entity, which they are not, and treating the consolidated proceedings as a single joined proceeding, which they also are not.

Petitioner LEDVANCE opposes PO's request. PO has presented no evidence that any entity other than LEDVANCE funded or controlled LEDVANCE's involvement in these proceedings or that any entity other than Co-Petitioners assisted or participated in these proceedings in any way. Moreover, PO waived this argument by failing to raise it at an appropriate time. If the Board finds supplemental information would be helpful, LEDVANCE would not oppose limited RPI discovery on the condition that PO provide reciprocal discovery regarding involvement and participation of foreign third parties in PO's litigation campaign against Petitioners, including third parties based in the People's Republic of China.

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From: McMahon, Charles <CMcMahon@beneschlaw.com>
Date: Tuesday, January 6, 2026 at 9:41 AM
To: Andrew Brown <andy@radip.com>
Cc: David Radulescu <david@radip.com>, Etai Lahav <etai@radip.com>, Savant_IPR_Service <Savant_IPR_Service@radip.com>, FeitElectricIPR <FeitElectricIPR@beneschlaw.com>
Subject: Re: IPR2024-01357 and IPR2025-00260: Draft Message to Board

Andy,

We are still waiting on your response, which you indicated was forthcoming more than two weeks ago. Please provide your position statement and availability so that we can contact the Board.

With respect to scheduling, it is premature to assume that the Board will automatically be moving the hearing date. The hearing date was set in anticipation of Feit Electric filing its motion to amend, with knowledge of the rules and briefing associated therewith. Scheduling is something that we can discuss with the Board during our conference and is not an excuse to hold up the process.

Best,
Charlie

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From: Andrew Brown <andy@radip.com>
Date: Friday, December 19, 2025 at 2:56 PM
To: McMahon, Charles <CMcMahon@beneschlaw.com>
Cc: David Radulescu <david@radip.com>, Etai Lahav <etai@radip.com>, Savant_IPR_Service <Savant_IPR_Service@radip.com>, FeitElectricIPR <FeitElectricIPR@beneschlaw.com>
Subject: Re: IPR2024-01357 and IPR2025-00260: Draft Message to Board

Charlie,

We will get back to you with Petitioners' position statements.

One question for clarification. In the draft email below, Feit caveats its position on scheduling based on "the February 12, 2026 hearing date." While the Board has not yet issued a revised schedule, we anticipated the Board moving the hearing date to accommodate full briefing on Feit's Revised MTA. Is Feit intending to waive any reply in support of its Revised MTA to keep the current hearing date? Please let us know.

Thanks,
Andy

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From: McMahon, Charles <CMcMahon@beneschlaw.com>
Date: Wednesday, December 17, 2025 at 11:19 PM
To: Andrew Brown <andy@radip.com>
Cc: David Radulescu <david@radip.com>, Etai Lahav <etai@radip.com>, Savant_IPR_Service <Savant_IPR_Service@radip.com>, FeitElectricIPR <FeitElectricIPR@beneschlaw.com>
Subject: Re: IPR2024-01357 and IPR2025-00260: Draft Message to Board

Hi Andy,

We disagree with the narrative in your message and further disagree that the patent purchase agreement has any relevance to the subject proceeding. Nevertheless, we are willing to produce the agreement in this matter provided an agreeable protective order is put into place.

Below is a draft email to the Board for your review. Please let us know your availability for a conference with the Board and if you have any comments to the email below.

Re: IPR2024-01357 and IPR2025-00260: Patent Owner's Proposed Motion to Terminate

Dear Honorable Board,

On December 5, Patent Owner and Petitioners met and conferred regarding the substance of Patent Owner's request to file a motion to terminate these consolidated proceedings. The Parties discussed the merits of the potential motion but were unable to reach agreement. After December 5, the Parties continued to confer via email to narrow the disputes and now seek a conference with the Board.

In particular, Patent Owner seeks to file a motion to terminate the consolidated proceedings based on two sets of case law that were each recently designated precedential. Patent Owner intends to show that these cases support termination because they indicate that Petitioner LEDVANCE LLC should have named its parent organization as an RPI and that all Petitioners should have disclosed their district court claim construction positions to the Board. Patent Owner also seeks leave to supplement the record with evidence in support of its motion to terminate. Petitioners' disagree with the substance of Patent Owner's motion, but will participate in a conference with the Board regarding Patent Owner's request.

Patent Owner is willing to accommodate a reasonable briefing schedule to accommodate the upcoming holidays and Petitioners' briefing regarding the pending revised motion to amend the claims, provided the briefing schedule does not affect the February 12, 2026 hearing date. Furthermore, Petitioners' requested that Patent Owner produce the purchase agreement associated with the challenged patent as part of the briefing. Patent Owner does not object to production of the purchase agreement, provided that a suitable protective order is first entered in this proceeding.

As the Parties were unable to reach agreement, they respectfully request a conference with the Board to discuss Patent Owner's request. The Parties are available on December 19, 22, 23, 26, 29, or 30.

Best regards,
Charlie

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From: Andrew Brown <andy@radip.com>
Date: Thursday, December 11, 2025 at 10:56 AM
To: McMahon, Charles <CMcMahon@beneschlaw.com>
Cc: David Radulescu <david@radip.com>, Etai Lahav <etai@radip.com>, Savant_IPR_Service <Savant_IPR_Service@radip.com>, FeitElectricIPR <FeitElectricIPR@beneschlaw.com>
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Charlie,
We appreciate the professional courtesy with respect to potential scheduling.
The patent purchase agreement would likely tend to disprove what appears to be Feit's conspiracy theory. It appears that Kaistar armed Feit with the patents so that Feit could sue LEDVANCE and others without naming Kaistar as a party. That Feit is a willing proxy for Kaistar as plaintiff makes it implausible that Kaistar is also at the center of a diffuse Chinese government conspiracy directing LEDVANCE's defense and the conduct of these IPRs. It appears that Feit is projecting, and discovery regarding Feit's patent purchase is likely to show that.
Thanks,
Andy

212-713-0356
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From: McMahon, Charles <CMcMahon@beneschlaw.com>
Sent: Tuesday, December 9, 2025 9:15 PM
To: Andrew Brown <andy@radip.com>
Cc: David Radulescu <david@radip.com>; Etai Lahav <etai@radip.com>; Savant_IPR_Service <Savant_IPR_Service@radip.com>; FeitElectricIPR <FeitElectricIPR@beneschlaw.com>
Subject: Re: IPR2024-01357 and IPR2025-00260: Draft Message to Board

Andy,

Regarding the briefing schedule, we do not oppose reasonable accommodations for the holidays and Petitioners' opposition to the revised motion to amend, but we do not think that a full month for the response brief is necessary. Petitioners' have been on notice of the arguments since the middle of November, and any further delay may jeopardize the current procedural schedule, which we oppose where avoidable. We are happy to discuss this further with the Board during the teleconference.

Regarding the purchase agreement, what exactly do Petitioners contend is the relevance to Patent Owner's proposed motion to terminate?

Best regards,
Charlie

<image001.jpg>

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On Dec 8, 2025, at 11:29, Andrew Brown <andy@radip.com> wrote:

Charlie,

On Friday, we discussed the briefing schedule sought by Feit and whether Feit would produce documents evidencing its connections to MLS, e.g., its patent purchase agreement with Bridgelux. Petitioners position is that, should the Board authorize a motion to dismiss (which Petitioners oppose), briefing should not interfere with Petitioners briefing on their opposition to the revised motion to amend and the holidays, and Feit should produce its agreement with Bridgelux. I understood you would be providing Feit's position on these issues this morning. Please let us know, should the Board authorize a motion, whether Feit would oppose briefing in January and whether it would oppose producing its patent purchase agreement with Bridgelux.

Thanks,

Andy

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From: McMahon, Charles <CMcMahon@beneschlaw.com>
Sent: Monday, December 8, 2025 10:51 AM
To: Andrew Brown <andy@radip.com>
Cc: David Radulescu <david@radip.com>; Etai Lahav <etai@radip.com>;
Savant_IPR_Service <Savant_IPR_Service@radip.com>; FeitElectricIPR
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Subject: IPR2024-01357 and IPR2025-00260: Draft Message to Board

Hi Andy,

Thank you for your time on Friday. Per our discussion, below is a draft email to the Board. We kept it non-argumentative, per the Board's direction, but we left a space for Petitioners' response. Please let us know if you have any comments and we can send the message later today.

Best,
Charlie

Re: IPR2024-01357 and IPR2025-00260: Patent Owner's Proposed Motion to Terminate

Dear Honorable Board,

On December 5, Patent Owner and Petitioners met and conferred regarding the substance of Patent Owner's request to file a motion to terminate these consolidated proceedings. The Parties discussed the merits of the potential motion but were unable to reach agreement.

In particular, Patent Owner seeks to file a motion to terminate the consolidated proceedings based on two sets of case law that were each recently designated precedential. These cases indicate that Petitioner LEDVANCE LLC should have named its parent organization as an RPI and that all Petitioners should have disclosed their district court claim construction positions to the Board. Patent Owner intends to show that these deficiencies require termination of the consolidated proceedings. Patent Owner also seeks leave to supplement the record with evidence in support of its motion to terminate.

[Petitioner Response]

As the Parties were unable to reach agreement, they respectfully request a conference with the Board to discuss Patent Owner's request. The Parties are available on December 9, 10, 11, and 12.

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