

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 REPLY BRIEF IN SUPPORT OF ITS
MOTION TO TERMINATE FOR FAILURE TO NAME
ALL REAL-PARTIES-IN-INTEREST**

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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 Applied Physics Letters 3971 (2004).

Exhibit No.	Description
2017	Michael R. Krames et al., <i>Status and Future of High-Power Light-Emitting Diodes for Solid-State Lighting</i> , 3 J. Display Tech. 160 (2007)
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

Exhibit No.	Description
2037	Reddit: Do white filament LED edison bulbs exist?
2038	Deposition Transcript of William A. Doolittle, Ph.D., dated July 17, 2025
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	April 3, 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: Who we are and what this means for our stakeholders, <i>available at</i> https://www.ledvance.com/en-int/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	Patent Owner’s Demonstrative Exhibits, February 26, 2026
2062	Stipulation dated March 3, 2026, in Feit Electric Company, Inc. v. Savant Techs. LLC, Case No. 1:24-cv-473 (N.D. Ohio) (Dkt. 50)
2063	Notice and Stipulation Concerning Withdrawal of Claim Construction Position in Feit Electric Company, Inc. v. LEDVANCE, LLC, Case No. 5:24-00031 (E.D. Ky.) (Dkt. 67)
2064	Declaration of Andrew Martin in Support of Petitioners’ Opposition to PO’s Motion to Terminate, Feb. 20, 2026
2065	RESERVED
2066	RESERVED
2067	RESERVED
2068	RESERVED
2069	MLS Co., Ltd. Independent Financial Advisor Report, September 2017 (Chinese) (<i>see</i> EX-2118)
2070	MLS Co., Ltd. Independent Financial Advisor Report, September 2017 (partial English translation)
2071	MLS Co., Ltd. 2024 Annual Report, April 2025 (Chinese) (<i>see</i> EX-2118)
2072	MLS Co., Ltd. 2024 Annual Report, April 2025 (partial English translation)
2073	RESERVED
2074	RESERVED
2075	RESERVED
2076	RESERVED
2077	July 26, 2016 Osram Press Release
2078	RESERVED
2079	RESERVED
2080	April 1, 2020 LEDInside Article

Exhibit No.	Description
2081	February 11, 2026 LEDVANCE Press Release on new Canada CEO
2082	RESERVED
2083	RESERVED
2084	MLS - 5 Manufacturing Bases
2085	BaiduWiki Entry for MLS
2086	ITC-337-TA-1163 Complaint
2087	ITC-337-TA-1163 MLS PI Comments
2088	ITC-337-TA-1163 MLS Response to Complaint
2089	RESERVED
2090	RESERVED
2091	RESERVED
2092	RESERVED
2093	RESERVED
2094	RESERVED
2095	Sylvania White Filament
2096	MLS Co., Ltd. Plan for Issuance of Shares and Payment of Cash to Purchase Assets, April 2017 (Chinese) (<i>see</i> EX-2118)
2097	MLS Co., Ltd. Plan for Issuance of Shares and Payment of Cash to Purchase Assets, April 2017 (partial English translation)
2098	MLS Co., Ltd. Website (Chinese) (<i>see</i> EX-2118)
2099	MLS Co., Ltd. Website (English translation)
2100	Press Release on appointment of Jonathan Lubeck
2101	Press Release on appointment of Markus Emmert
2102	MLS Co., Ltd. Reply to Feedback on Application for Public Issuance of Convertible Corporate Bonds, 2nd Revised Draft (Chinese) (<i>see</i> EX-2118)
2103	MLS Co., Ltd. Reply to Feedback on Application for Public Issuance of Convertible Corporate Bonds, 2 nd Revised Draft (partial English translation)
2104	YIWU HARMONY CORE LIGHTING CO., LTD, U.S. Import Activity
2105	RESERVED
2106	RESERVED
2107	RESERVED
2108	RESERVED
2109	Bill of Lading for MEDUGS602894
2110	RESERVED
2111	MLS Co., Ltd. Plan for Issuance of Shares and Payment of Cash to Purchase Assets, April 2017 (English translation)

Exhibit No.	Description
2112	MLS Co., Ltd. Reply to Feedback on Application for Public Issuance of Convertible Corporate Bonds, 2nd Revised Draft (English translation)
2113	MLS Co., Ltd. Independent Financial Advisor Report, September 2017 (English translation)
2114	MLS Co., Ltd. 2024 Annual Report, April 2025 (English translation)
2115	RESERVED
2116	Transcript of the Deposition of Andrew Martin, May 19, 2026 (SEALED)
2117	Transcript of the Deposition of Andrew Martin, May 19, 2026 (redacted)
2118	Declaration of Zhao Qiming

LIST OF FOREIGN LANGUAGE EXHIBITS

Description	Exhibit Number		
	Original	Partial Certified Translation	Full Certified Translation
MLS Co., Ltd. Independent Financial Advisor Report, September 2017	EX-2069	EX-2070	EX-2113
MLS Co., Ltd. 2024 Annual Report, April 2025	EX-2071	EX-2072	EX-2114
MLS Co., Ltd. Plan for Issuance of Shares and Payment of Cash to Purchase Assets, April 2017	EX-2096	EX-2097	EX-2111
MLS Co., Ltd. Website	EX-2098	EX-2099	EX-2099
MLS Co., Ltd. Reply to Feedback on Application for Public Issuance of Convertible Corporate Bonds, 2 nd Revised Draft	EX-2102	EX-2103	EX-2112

LEDVANCE LLC’s attempt to hide RPIs through Andrew Martin’s declaration—including parties backed by the Chinese government—crumbled under cross-examination. LEDVANCE LLC is both integrated with and controlled by MLS Co., Ltd. (“MLS”). Mr. Martin’s contrary testimony is belied by public statements from (1) MLS and its founder (Qinghuan Sun), (2) LEDVANCE GmbH and its CEO (*also* Qinghuan Sun), and (3) LEDVANCE LLC’s CEO, Jonathan Lubeck. MLS and LEDVANCE operate as a vertically “integrated” supplier of LED lights, including the white filament LED bulbs that infringe the ’678 patent.

MLS purchased LEDVANCE to create and control a global, vertically integrated supply chain. MLS *mandates* that LEDVANCE use its LEDs and built a new factory in Yiwu, China, to assemble LEDVANCE’s white filament LED bulbs. MLS then *closed* LEDVANCE’s U.S. factories as part of a “restructuring.”

The truth is that MLS controls and operates LEDVANCE and has a very real interest in all of LEDVANCE’s LED products, including the white filament LED bulbs that Patent Owner has accused of infringing the ’678 patent.

I. MLS and LEDVANCE Are One “Integrated” Global Platform

LEDVANCE LLC was required to identify *all* RPIs in the petition and bears the burden of showing that it did so. *Yangtze Memory Technologies Co., Ltd. v. Micron Technology, Inc.*, IPR2025-00098, IPR2025-00099, Paper 38 (PTAB Jan. 15, 2026). Cross examination of Mr. Martin and public statements from MLS and

LEDVANCE show that Petitioner has failed on both points.

A. MLS Owns and Controls LEDVANCE

MLS, *aka* Mulinsen Co. Ltd. (Stock Code 002745; *see* EX-2059, EX-2097), led a consortium to buy LEDVANCE to facilitate MLS's goal of establishing a vertically integrated platform for the supply and sale of LED products. EX-2116, 10:4-12:5, 21:9-22, 23:18-24:11, 75:12-77:13; EX-2040. MLS later consolidated ownership of LEDVANCE by buying out the other consortium members. *Id.* at 41:15-43:5. Mr. Martin tried to deny MLS's ownership and control of LEDVANCE LLC, with the aid of counsel's speaking objections, but there is no real dispute on this point. *Id.* at 12:17-19, 24:15-19, 65:2-66:19, 67:4-20, 68:12-17, 70:2-73:1, 78:6-79:7; *see also* EX-2064, ¶ 5; EX-1073 at 1; EX-1077 at 2. MLS identifies LEDVANCE LLC as a "significant subsidiary" and claims both MLS *and* LEDVANCE as its "subsidiary brands." EX-2116, 101:14-19, 105:3-21, 146:14-147:5, 152:13-18; EX-2096 at 16; EX-2045; EX-2085 at 1, 4. MLS incorporated LEDVANCE into its financial statements and has stated that it controls LEDVANCE. EX-2103 at 21; EX-2116, 189:12-190:6.

B. MLS Replaced LEDVANCE's Factories With Its Own

MLS acquired the LEDVANCE entities to gain exclusive access to LEDVANCE's U.S. and other global markets for LED products. EX-2116, 56:9-13, 75:12-77:13, 78:6-79:7, 95:7-95:13, 116:17-119:2, 120:12-121:2; EX-2040;

EX-2077; EX-2070 at 7-8. MLS mandated that LEDVANCE begin using MLS LED components, including its infringing white filament LED bulbs. EX-2070 at 8; EX-2041; EX-2116, 119:17-120:4, 83:3-85:13. MLS even built a new factory in Yiwu, China, to build LED filament bulbs for LEDVANCE. EX-2085 at 5; EX-2084 at 1; EX-2103 at 1-2, 5, 9, 12, 15-16, 18; EX-2116, 152:19-153:17, 172:10-187:16, 157:12-160:8. MLS completed the Yiwu factory in 2016 and, importantly here, *MLS then closed LEDVANCE's factories* as part of a “restructuring.” EX-2099 at 2-3; *see also* EX-2116, 148:20-152:7, 153:20-157:5; EX-2085 at 3. This is clear demonstration of the direct control MLS has over LEDVANCE's operation.

Mr. Martin admitted that [REDACTED]

[REDACTED] EX-2116, 32:20-33:14. Import records show that Yiwu Harmony Core Lighting Co. Ltd. (“Harmony”)—another MLS entity—has shipped the accused white filament LED bulbs to LEDVANCE's distribution center in Pennsylvania. EX-2116, 160:9-165:9; EX-2095 at 5; EX-2109 at 2. Additional import records show that Harmony's U.S. shipments have been directed *exclusively* to LEDVANCE LLC. EX-2109 at 2; EX-2104 at 1-2; EX-2116, 165:11-167:4.

C. LEDVANCE is Part of the “Integrated” MLS Platform

Contrary to Mr. Martin's description of LEDVANCE LLC as “independent,” formal MLS documents describe LEDVANCE as “integrated” into MLS's global

platform. EX-1077 at 2; EX-2070 at 7; EX-2103 at 5, 12, 18, 19; *see also* EX-2116, 70:18-71:15, 116:15-117:22, 183:8-191:14. Mr. Martin disputed the term “integrated,” but LEDVANCE LLC’s CEO touts LEDVANCE and MLS as “the only globally vertically integrated general lighting company.” *Compare* EX-2116, 188:5-21 *with* EX-2100; *see also* EX-2116, 194:18-196:7. Indeed, MLS *and* LEDVANCE both consistently refer to their global network spanning “140 countries and regions.” EX-2116, 73:2-13, 74:21-75:2, 145:15-146:9, 196:8-198:19; EX-1077; EX-2058; EX-2085; EX-2100.

D. MLS Controls LEDVANCE Leadership

MLS’s founder, Qinghuan Sun, is the “Global Chief Executive Officer” of LEDVANCE, which Mr. Martin conspicuously omitted from his declaration. EX-2116, 143:6-8, 39:8-17, 89:15-91:1; EX-2081; EX-2042; EX-2101. Mr. Sun is just one of *many* officers and directors with leadership roles at both MLS and various LEDVANCE entities. EX-2116, 128:4-141:3; EX-2072 at 4-6. As the entity controlling this global, integrated platform, MLS has been clear that it would reorganize and replace LEDVANCE’s board of directors, supervisory board, and officers to serve MLS interests. EX-2070 at 23-24; EX-2116, 123:13-127:5.

II. LEDVANCE’s U.S. Patent Litigation Is Material to MLS

Those interests include LEDVANCE’s U.S. patent litigation, which MLS regulatory filings describe in detail. EX-2116, 191:15-192:14; EX-2103 at 32.

Mr. Martin admitted that he reports these details to MLS's auditors. *Id.* He has also served as a legal representative for LEDVANCE *and* MLS, verifying and signing a *joint* response to an ITC complaint, although he initially denied doing so until confronted with the document bearing his signature. EX-2116, 45:17-22, 207:21-208:9; EX-2088 at 86. The law firm Mr. Martin hired filed papers admitting that "LEDVANCE LLC is wholly owned by MLS" and referring to both companies as simply "LEDVANCE." EX-2116, 198:22-203:17, 205:11-207:10.

III. MLS Remains Connected to the Chinese Government

MLS receives subsidies directly from the Chinese government to support its LED lighting endeavors. EX-2080. As discussed in the opening brief, MLS also has significant ties to CEC. Paper 57 at 5, 8. For his part, Mr. Martin asserts that Yiwu *State-Owned* Assts Operation Center ("YSOAO") sold its share of LEDVANCE to MLS (EX-2064, ¶ 7), but he tells only part of the story. YSOAO now owns part *of* MLS *itself*. EX-2058; EX-2041; EX-2116, 39:22-43:15, 75:12-76:5, 80:22-83:13. And Mr. Sun served in the 14th Zhongshan Municipal People's Congress. EX-2072 at 6; EX-2116, 141:4-17; *see also* Paper 57 at 8. These connections are particularly relevant given the Director's concerns about influence from foreign state-backed actors. *See* Paper 57 at 8.

Cross-examination established that MLS controls LEDVANCE and has a real interest in this dispute, and LEDVANCE did *not* name *all* RPIs.

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Date: June 4, 2026

Respectfully submitted,

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CERTIFICATE OF PAGE COUNT

I, the undersigned, do hereby certify that the foregoing Patent Owner's Request for Director Review contains no more than 5 pages, consistent with the Board's Order (Paper 75 at 2), 37 C.F.R. §§ 42.75(c)(2) and 42.24(a)(1)(v).

/Charles M. McMahon/

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CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2026, a true and correct copy of the foregoing
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