

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

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 TO SEAL

Mail Stop Patent Board
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Patent Owner moves to seal Patent Owner's Reply Brief in Support of Its Motion to Terminate for Failure to Name All Real-Parties-In-Interest (the "Reply Brief") and EX-2116 that accompanies the Reply Brief.

Good Cause Exists to Seal the Reply Brief and EX-2116. A motion to seal is governed by a two-part standard: the movant must (1) show good cause to seal the document, and (2) narrowly tailor the request to cover only truly confidential information. *Argentum Pharm. LLC v. Alcon Research, Ltd.*, IPR2017-01053, Paper 27 at 4 (PTAB Jan. 19, 2018) (informative); *see* 37 C.F.R. § 42.54(a). Both requirements are satisfied here.

EX-2116 is the May 19, 2026 deposition transcript of Mr. Andrew Martin, a corporate representative of Petitioner LEDVANCE LLC. The transcript describes internal business information and procedures of LEDVANCE that are not publicly available. This non-public information reflects commercially sensitive information, disclosure of which would give competitors insight into LEDVANCE's internal business matters. The Reply Brief incorporates confidential and commercially sensitive portions of EX-2116. Good cause therefore exists to seal the Reply Brief and EX-2116 as Highly Confidential – Attorney's Eyes Only under the proposed protective order (Paper 71, Exhibit A).

The request is also narrowly tailored. Patent Owner seeks to seal only the minimum necessary information in the Reply Brief and EX-2116. Patent Owner has provided public versions of both the Reply Brief (*see* Paper 77) and EX-2116 (*see* EX-2117), each of which redact sensitive, non-public information. *See* Trial Practice Guide, § I.E.6; Paper 71, Exhibit A (Proposed Protective Order), § 7.

For the foregoing reasons, the parties request that the Board enter the proposed protective order (*see* Paper 71) and that the Reply Brief and EX-2116 be entered under seal as Highly Confidential – Attorney’s Eyes Only information under the protective order.

Date: June 4, 2026

Respectfully submitted,

/Charles M. McMahon/

Charles M. McMahon
USPTO Reg. No. 44,926
Kal K. Shah
USPTO Reg. No. 48,387
Thomas DaMario
USPTO Reg. No. 77,142
BENESCH FRIEDLANDER
COPLAN & ARONOFF LLP
71 South Wacker Drive, Suite 1600
Chicago, IL 60606
Tel: (312) 212-4949
Fax: (312) 767-9192
Email: FeitElectricIPR@beneschlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2026, a true and correct copy of the foregoing
was served by electronic mail upon the following counsel of record for Petitioners:

David C. Radulescu, Ph.D., david@radip.com,
Etai Lahav, etai@radip.com
Andrew S. Brown, andy@radip.com
Savant_IPR_Service@radip.com

/Charles M. McMahon/

Charles M. McMahon