

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

**PETITIONER LEDVANCE LLC'S RESPONSES TO
PO'S AMENDED FIRST REQUEST FOR DISCOVERY**

On March 26, 2026, the Board granted PO's request to file a Motion for Additional Discovery (Paper 66). In its order, the Board "advised Patent Owner that, as written, the requests were too broad, and that, given the late stage of the proceeding and limited time remaining to decide these cases, Patent Owner should propose more narrowly tailored requests in its motion." (*Id.* at 2) Despite the Board's instructions, the PO continued with its expansive discovery requests in its Motion for Additional Discovery filed April 3, 2026 (Paper 68). The Board again admonished the PO for not seeking "targeted discovery" and substantially denied PO's discovery request granting only a significantly narrowed scope of discovery. (*See*, Board's Order April 30, 2026 (Paper 73)) Not to be deterred, the PO continues to serve discovery requests beyond the scope authorized by the Board. On May 1, 2026, PO served its First Request for Discovery seeking discovery not authorized by the Board. After Petitioner objected, PO filed an Amended First Request for Discovery on May 4, 2026 that still exceeds the scope of discovery authorized by the Board in Paper 73.

Rather than continue this back and forth until the PO complies with the Board's Order, Petitioner LEDVANCE LLC responds to PO's Amended First Request for Discovery, served May 4, 2026, as follows. LEDVANCE LLC objects to PO's requests to the extent they exceed the significantly narrowed scope of

additional discovery authorized by the Board's Order of April 30, 2026 (Paper 73)
in IPR2024-01357.

RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Identify and produce any agreements regarding indemnification or cooperation related to the '678 patent between or among LEDVANCE LLC and LEDVANCE Holdings LLC, LEDVANCE GmbH, and MLS Co., Ltd.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Petitioner LEDVANCE LLC objects to this request to the extent it seeks documents beyond the scope of discovery authorized by Paper 73, including seeking agreements involving entities other than LEDVANCE LLC and MLS Co., Ltd. Subject to these objections, LEDVANCE LLC responds that, after a reasonable inquiry, it has not identified any agreements within its possession, custody, or control between LEDVANCE LLC and MLS Co., Ltd. regarding indemnification or cooperation related to the '678 patent.

REQUEST FOR PRODUCTION NO. 2:

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 in matters relating to the '678 patent or patents related thereto. 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.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

Petitioner LEDVANCE LLC objects to this request to the extent it exceeds the scope of discovery authorized by Paper 73, including by seeking discovery concerning "matters relating to" the '678 patent or patents related thereto, as further expanded by PO's definition of "relating to," rather than proceedings "involving" the '678 patent or patents related thereto. Subject to these objections, LEDVANCE LLC responds that, after reasonable inquiry, it has not identified any instances in which LEDVANCE LLC, LEDVANCE GmbH, and/or MLS Co. Ltd. shared legal counsel in any proceeding involving the '678 patent or patents related thereto, and it has not located any responsive documents within its possession, custody, or control.

RESPONSES TO 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.

RESPONSE TO REQUEST FOR ADMISSION NO. 1:

Petitioner LEDVANCE LLC is unable to truthfully admit or deny this request. LEDVANCE GmbH is a separate legal entity, and after reasonable inquiry, the information known or readily obtainable by LEDVANCE LLC is insufficient to enable it to admit or deny.

REQUEST FOR ADMISSION NO. 2:

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

RESPONSE TO REQUEST FOR ADMISSION NO. 2:

Denied.

REQUEST FOR ADMISSION NO. 3:

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

RESPONSE TO REQUEST FOR ADMISSION NO. 3:

Petitioner LEDVANCE LLC is unable to truthfully admit or deny this request. LEDVANCE GmbH is a separate legal entity, and after reasonable inquiry, the information known or readily obtainable by LEDVANCE LLC is insufficient to enable it to admit or deny.

REQUEST FOR ADMISSION NO. 4:

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

RESPONSE TO REQUEST FOR ADMISSION NO. 4:

Denied.

REQUEST FOR ADMISSION NO. 5:

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

RESPONSE TO REQUEST FOR ADMISSION NO. 5:

Petitioner LEDVANCE LLC is unable to truthfully admit or deny this request. LEDVANCE GmbH is a separate legal entity, and after reasonable inquiry, the information known or readily obtainable by LEDVANCE LLC is insufficient to enable it to admit or deny.

REQUEST FOR ADMISSION NO. 6:

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

RESPONSE TO REQUEST FOR ADMISSION NO. 6:

Denied.

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.

RESPONSE TO REQUEST FOR ADMISSION NO. 7:

Petitioner LEDVANCE LLC is unable to truthfully admit or deny this request. LEDVANCE GmbH is a separate legal entity, and after reasonable inquiry, the information known or readily obtainable by LEDVANCE LLC is insufficient to enable it to admit or deny.

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.

RESPONSE TO REQUEST FOR ADMISSION NO. 8:

Denied.

Date: May 14, 2026

Respectfully submitted,

/s/David C. Radulescu
David C. Radulescu, Lead Counsel
Reg. No. 36,250

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was served on counsel at the following electronic service addresses:

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Date: May 14, 2026

/s/David C. Radulescu

David C. Radulescu, Lead Counsel

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