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
U.S. Patent No. 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
U.S. Patent No. 8,604,678

FEIT ELECTRIC COMPANY, INC.'S FIRST
REQUEST FOR DISCOVERY TO PETITIONER LEDVANCE LLC

Patent Owner Feit Electric Company, Inc. ("Feit Electric") requests that Petitioner LEDVANCE LLC respond to the following requests for production and requests for admission in accordance with the following instructions and definitions.

DEFINITIONS

1. "Petitioner," "LEDVANCE LLC," "You," or "Your," means Petitioner LEDVANCE LLC.

2. "Affiliate" means any entity directly or indirectly owned or controlled by, any person who directly or indirectly owns or controls, or any entity which directly or indirectly is under common ownership or control with the relevant entity.

3. "'678 Patent" means U.S. Patent No. 8,604,678.

4. "Relevant Industry" means any technologies relating to LED lighting products.

5. "Relating to," "relate to," "referring to" and "refer to" mean relating to, reflecting, referring to, concerning, mentioning, pertaining to, evidencing, involving, describing, discussing, commenting on, embodying, responding to, supporting, contradicting, or constituting (in whole or in part), as the context makes appropriate.

6. "Include" and "including" means including without limitation.

7. "Or" and "and" shall be read in the conjunctive and in the disjunctive wherever they appear, and neither of these words shall be interpreted to limit the scope of these Requests for Production and Requests for Admission.

8. Use of the singular shall be read as including the plural and vice-versa.

9. Use of a verb in any tense shall be construed as the use of the verb in all other tenses.

INSTRUCTIONS

The following instructions shall apply to each of the document requests herein:

1. Answer each of the following requests in writing, and produce all documents and things requested therein.

2. In answering the following requests for production, furnish all available documents and things, within your possession, custody, or control. If You cannot fully respond to the following requests after exercising due diligence to secure the documents requested thereby, so state, and specify the portion of each request that cannot be responded to fully and completely.

3. If any documents and/or things requested are claimed to be privileged or otherwise immune from discovery, please provide all documents and things falling within the scope of the request for production that are not privileged, and for each document or thing to which a claim of privilege is made, identify such document or thing with sufficient particularity.

4. If You are not able to truthfully admit or deny any request for admission, please explain the basis for your response.

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.

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.

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.

REQUEST FOR ADMISSION NO. 2:

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

REQUEST FOR ADMISSION NO. 3:

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

REQUEST FOR ADMISSION NO. 4:

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

REQUEST FOR ADMISSION NO. 5:

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

REQUEST FOR ADMISSION NO. 6:

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

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.

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.

Date: May 4, 2026

Respectfully submitted,

/Charles M. McMahon/

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CERTIFICATE OF SERVICE

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

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