

From: "DaMario, Thomas" <TDaMario@beneschlaw.com>

Sent: Mon, 04 May 2026 16:24:52 +0000

To: Andrew Brown <andy@radip.com>, "McMahon, Charles" <CMcMahon@beneschlaw.com>

Cc: "Baker, Jodi" <jrbaker@beneschlaw.com>, Savant_IPR_Service <Savant_IPR_Service@radip.com>, David Radulescu <david@radip.com>, Etai Lahav <etai@radip.com>, FeitElectricIPR <FeitElectricIPR@beneschlaw.com>

Subject: RE: SERVICE: IPR2024-01357: Discovery Requests

Hi Andy,

We will serve the updated requests shortly. For reference, below is a redline of updated RFP 1 (previously RFP 4):

Request For Production No. 1: Identify and produce any agreements ~~between LEDVANCE LLC and/or any Affiliate(s) thereof regarding the supply, sale, and/or importation of goods in the Relevant Industry. Include in your production all agreements concerning~~ ~~regarding~~ indemnification or cooperation related to the '678 patent ~~or related patents~~ between or among LEDVANCE LLC and LEDVANCE Holdings LLC, LEDVANCE GmbH, and MLS Co., Ltd.

Please let us know when you are available to meet and confer prior to Thursday's deadline to update the Board.

Best,
Tom



Thomas DaMario
(he/him/his)
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Confidentiality Notice to Incorrect Addressee: www.beneschlaw.com/confidentialitynotice

From: Andrew Brown <andy@radip.com>
Sent: Monday, May 4, 2026 10:39 AM
To: McMahon, Charles <CMcMahon@beneschlaw.com>
Cc: Baker, Jodi <jrbaker@beneschlaw.com>; Savant_IPR_Service <Savant_IPR_Service@radip.com>; David Radulescu <david@radip.com>; Etai Lahav <etai@radip.com>; FeitElectricIPR <FeitElectricIPR@beneschlaw.com>
Subject: Re: SERVICE: IPR2024-01357: Discovery Requests

Sorry, I didn't miss your follow up, I hit reply on the wrong message. We'll review the corrected requests when they are served. We'd appreciate a redline of the corrected requests to the original proposed requests to facilitate our review, so that we don't have to try to compare the PDFs.

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212-713-0356
andy@radip.com

From: McMahon, Charles <CMcMahon@beneschlaw.com>
Date: Monday, May 4, 2026 at 11:30 AM
To: Andrew Brown <andy@radip.com>
Cc: Baker, Jodi <jrbaker@beneschlaw.com>; Savant_IPR_Service <Savant_IPR_Service@radip.com>; David Radulescu <david@radip.com>; Etai Lahav <etai@radip.com>; FeitElectricIPR <FeitElectricIPR@beneschlaw.com>
Subject: Re: SERVICE: IPR2024-01357: Discovery Requests

Andy,

You either missed or are ignoring the subsequent message I sent on Friday afternoon at 3:30pm EDT, as well as the update and question we provided in that message. We now presume you have no

other concerns about the discovery requests other than RFP 1, so we will serve the requests again with the change to RFP 1 that I noted in my message on Friday.

Best regards,
Charlie



Charles M. McMahon
Partner
Benesch Friedlander Coplan & Aronoff LLP

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On May 4, 2026, at 09:23, Andrew Brown <andy@radip.com> wrote:

Charlie,

Complying with Board orders isn't optional. Unless you'd like to have a conference with the Board, LEDVANCE understands that Feit is withdrawing the improper requests.

If you'd like us to review corrected requests in advance of your formally serving them, we're happy to do so. When you provide them to us, please also include a redline from the original proposed requests (i.e., EX3002).

Thanks,
Andy

--
212-713-0356
andy@radip.com

From: McMahon, Charles <CMcMahon@beneschlaw.com>
Date: Friday, May 1, 2026 at 3:07 PM
To: Andrew Brown <andy@radip.com>; Baker, Jodi <jrbaker@beneschlaw.com>;
Savant_IPR_Service <Savant_IPR_Service@radip.com>; David Radulescu
<david@radip.com>; Etai Lahav <etai@radip.com>
Cc: FeitElectricIPR <FeitElectricIPR@beneschlaw.com>
Subject: Re: SERVICE: IPR2024-01357: Discovery Requests

Andy,

Our intent was to modify the requests to comply with the Board's order, and we believe we have done that. If you believe any request or instruction is inconsistent with the Board's order, please identify it specifically.

Thank you.

Best regards,
Charlie

Charles M. McMahon

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From: Andrew Brown <andy@radip.com>
Date: Friday, May 1, 2026 at 1:49 PM
To: Baker, Jodi <jrbaker@beneschlaw.com>; Savant_IPR_Service <savant_ipr_service@radip.com>; David Radulescu <david@radip.com>; Etai Lahav <etai@radip.com>
Cc: FeitElectricIPR <FeitElectricIPR@beneschlaw.com>
Subject: Re: SERVICE: IPR2024-01357: Discovery Requests

Counsel, Feit's requests are clearly inconsistent with the Board's order. Please withdraw these requests immediately. Thanks.

--
212-713-0356
andy@radip.com

From: Baker, Jodi <jrbaker@beneschlaw.com>
Date: Friday, May 1, 2026 at 2:31 PM
To: Savant_IPR_Service <Savant_IPR_Service@radip.com>; David Radulescu <david@radip.com>; Etai Lahav <etai@radip.com>; Andrew Brown <andy@radip.com>
Cc: FeitElectricIPR <FeitElectricIPR@beneschlaw.com>
Subject: SERVICE: IPR2024-01357: Discovery Requests

Counsel:

Attached please find Feit Electric's First Request for Discovery to Petitioner LEDVANCE LLC.

Best regards,
Jodi

Jodi R. Baker
(she/her/hers)
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