Appendix G-1

to

Signify's Initial Infringement Contentions

Appendix G-1 to Signify's Initial Infringement Contentions

Infringement of Claims 1, 3, 7, 9, 11-13, 15, and 19 of U.S. Patent No. 10,299,336 by at least the following products:

SKU#	Description
348-2107	Patriot Lighting 5070 Lumen 47.75" Back-Lit Flat Panel
349-1202	Patriot Lighting 4" Ultra-Thin Downlight
349-1292	Patriot Lighting 6" Ultra-Thin Downlight (3 PK)

The following claim chart demonstrates how each and every limitation of at least claims 1, 3, 7, 9, 11-13, 15, and 19 of the '336 Patent is met by at least each of the '336 Accused Products identified above. The following chart uses the Patriot Lighting 6" Ultra-Thin Downlight (SKU#: 349-1292) as representative of the remaining '336 Accused Products identified above. Signify contends that the '336 Accused Products identified above infringe at least claims 1, 3, 7, 9, 11-13, 15, and 19 of the '336 Patent in the same manner as demonstrated below. Based on a review of the actual physical '336 Accused Products, pictures of these products, Menard's online description of these products, and/or their corresponding data sheets and installation manuals, all '336 Accused Products identified above are believed to have the same or similar elements, functionality, and/or installation methods for purposes of the infringement analysis. Accordingly, any differences between the '336 Accused Products identified above are immaterial to infringement of the '336 Patent. Menard has not identified any material differences between the Patriot Lighting 6" Ultra-Thin Downlight (SKU#: 349-1292) and the '336 Accused Products identified above that would impact the infringement analysis in any way. Signify reserves the right to amend its contentions as to these products should Menard provide information showing any relevant differences among the products or any additional products containing the same functionality.

Signify further contends that all claim limitations are literally present in each respective '336 Accused Product identified above, as demonstrated below. To the extent that any claim limitation is found to not be literally present, Signify contends that such limitation is nonetheless present under the doctrine of equivalents. Regardless, Menard has not yet served its noninfringement contentions or otherwise identified any claim limitation that is allegedly missing from any accused product. Signify reserves the right to supplement its infringement contentions, including as to any doctrine of equivalents theory, and in response to any noninfringement arguments made by Menard.

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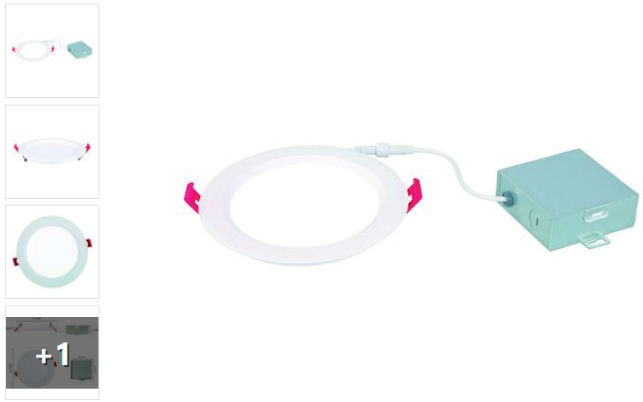
Patriot Lighting® 6" LED Ultra-Thin Downlight (SKU#: 349-1292)

Patriot Lighting® 6" LED Ultra-Thin Downlight - 3 pack
Adjustable Color Temperature
Model Number: 91288 | Menards ® SKU: 3491292



Description & Documents

Add more light to any space with this light. The six-inch diameter and white finish will blend in perfectly with most ceilings for a subtle look. It is functionality at its best and you'll certainly be happy with your choice.

Assembly Instructions

To read PDF files, you need the Adobe Acrobat Reader 6.0 or higher.
Click here to download it for free from Adobe's site.

Shipping Dimensions: 8.27 H x 7.87 W x 7.87 D
Shipping Weight: 3.3125 lbs

Brand Name: **Patriot Lighting**

Patriot LIGHTING.

Features

- This LED light has a CRI of 80, three color temperatures of 3000K, 4000K, and 5000K, and is 700 lumens
- Wafer baffle trim with white finish
- Type IC rated for direct contact with insulation
- Directly install to the ceiling for instant bright light
- Dimmable with compatible dimmer to enhance your control over the ambiance in your space.

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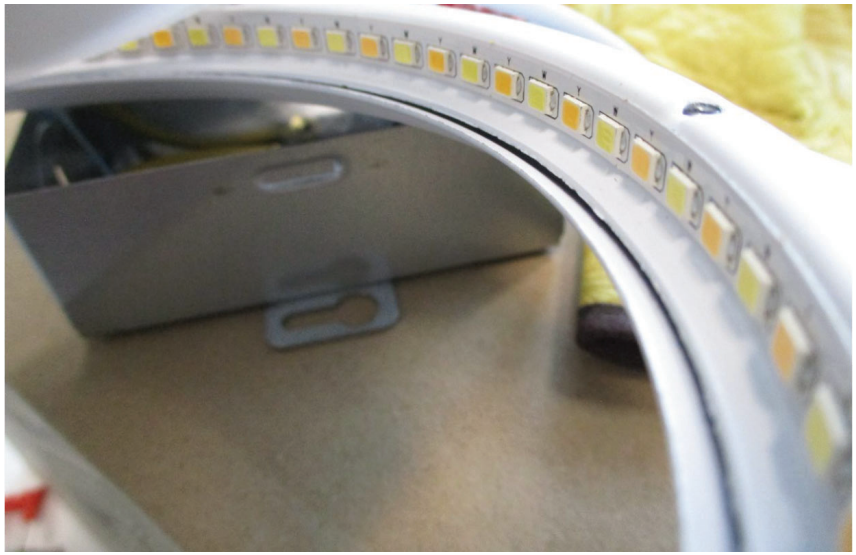
LED Light Module:



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U.S. Patent No. 10,299,336	
Claim 1	**SKU#: 349-1292**
[1.pre] A luminaire comprising:	The 349-1292 product is a luminaire. For example, the 349-1292 product can output 700 lumens of light and is dimmable for adjustable light brightness. **Description & Documents** Add more light to any space with this light. The six-inch diameter and white finish will blend in perfectly with most ceilings for a subtle look. It is functionality at its best and you'll certainly be happy with your choice. **Features** • This LED light has a CRI of 80, three color temperatures of 3000K, 4000K, and 5000K, and is 700 lumens • Wafer baffle trim with white finish • Type IC rated for direct contact with insulation • Directly install to the ceiling for instant bright light • Dimmable with compatible dimmer to enhance your control over the ambiance in your space. https://www.menards.com/main/lighting-ceiling-fans/indoor-lighting/recessed-lights/patriot-lighting-reg-6-led-ultra-thin-downlight-3-pack/91288/p-1567578524821-c-7499.htm

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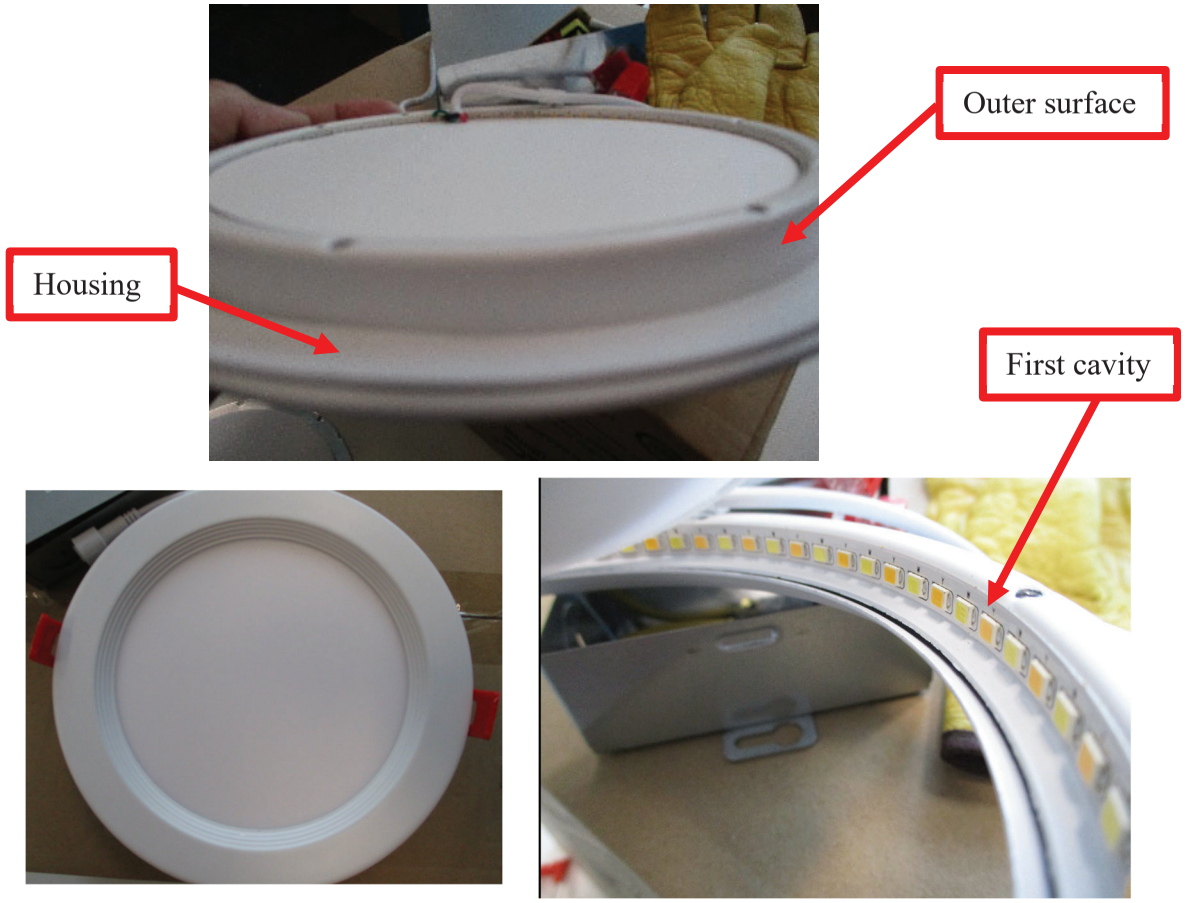
[1.a] a housing comprising at least one outer surface that forms a first cavity;	The 349-1292 product include a housing comprising at least one outer surface that forms a first cavity. For example, the 349-1292 product includes a metal housing, and at least one outer surface of the metal housing forms a first cavity within the metal housing. 

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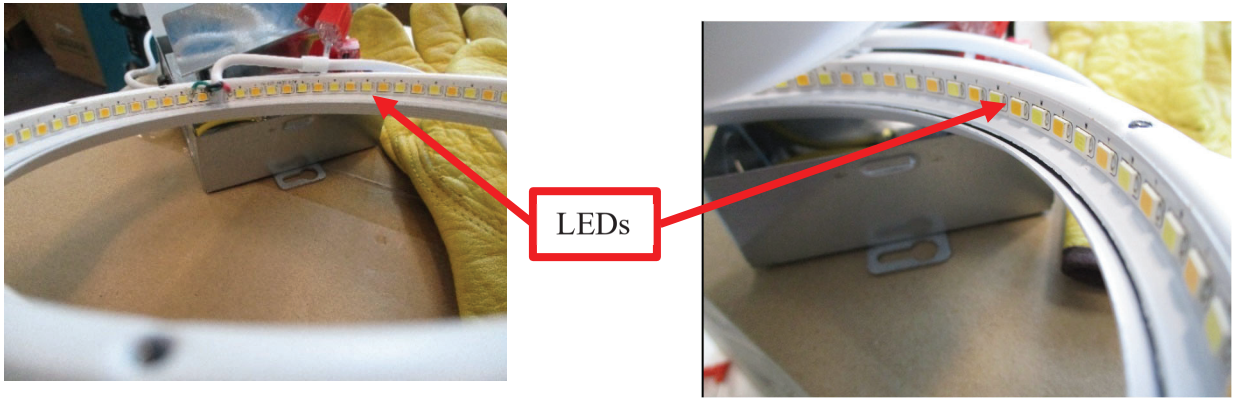
[1.b] at least one electrical component disposed, at least in part, within the first cavity;	The 349-1292 product includes at least one electrical component disposed, at least in part, within the first cavity. For example, the 349-1292 product includes LEDs disposed within the first cavity. 
[1.c] an electrical cable comprising a first end and a second end, wherein the first end is coupled to the at least one electrical component; and	The 349-1292 product includes an electrical cable comprising a first end and a second end, wherein the first end is coupled to the at least one electrical component. For example, the 349-1292 product includes an electrical cable with a first end and a second end, where the first end is coupled to electrical components, including LEDs, via a circuit board within the first cavity.

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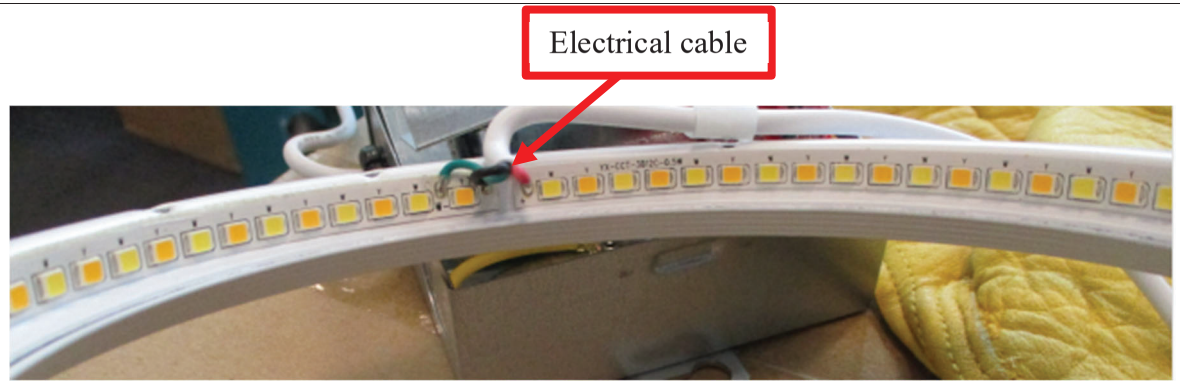

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[1.d] a switch coupled to the electrical cable, wherein the switch is disposed remotely from the housing, wherein the switch has a plurality of positions, wherein each position of the plurality of positions of the switch corresponds to a discrete correlated color temperature (CCT) output by one or more	The 349-1292 product includes a switch coupled to the electrical cable, wherein the switch is disposed remotely from the housing, wherein the switch has a plurality of positions, wherein each position of the plurality of positions of the switch corresponds to a discrete correlated color temperature (CCT) output by one or more light sources of the luminaire. For example, the 349-1292 product includes a CCT selection switch coupled to the electrical cable via a circuit board and located in a junction box disposed remotely from the housing, the CCT selection switch having three positions, each of which corresponds to a discrete correlated color temperature (CCT) output by one or more LEDs of the luminaire.

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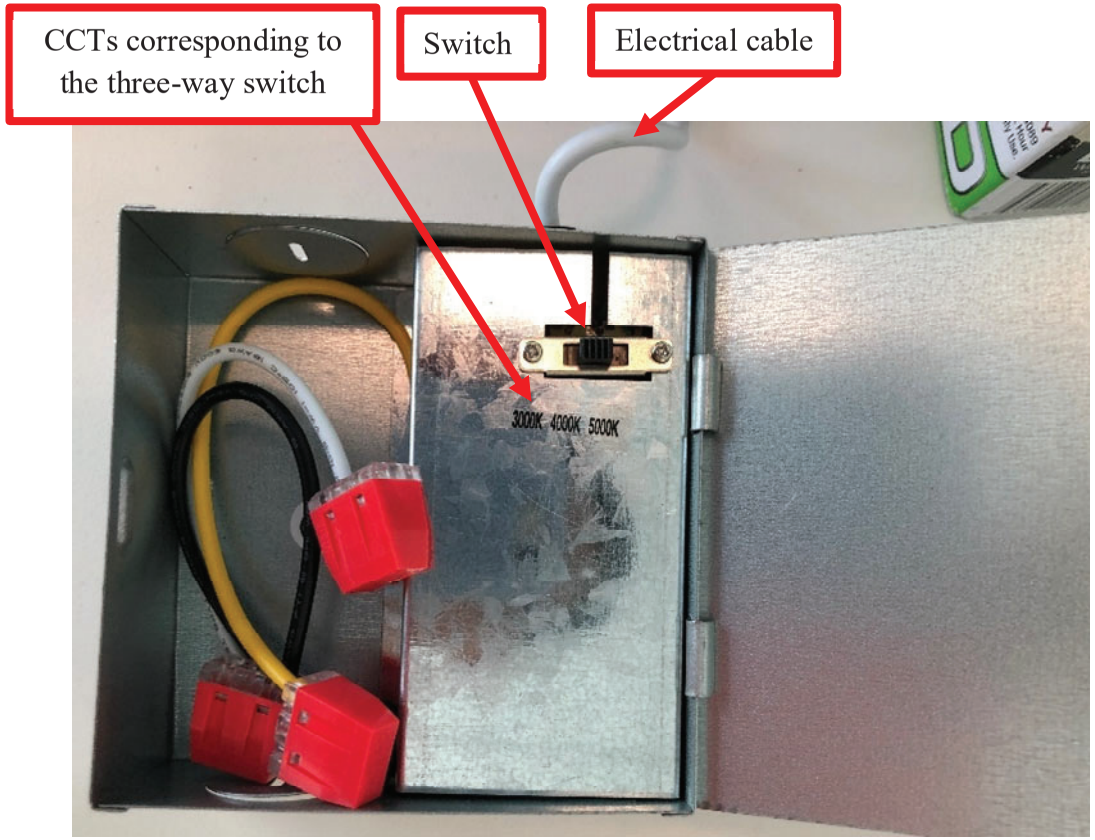
light sources of the luminaire.	

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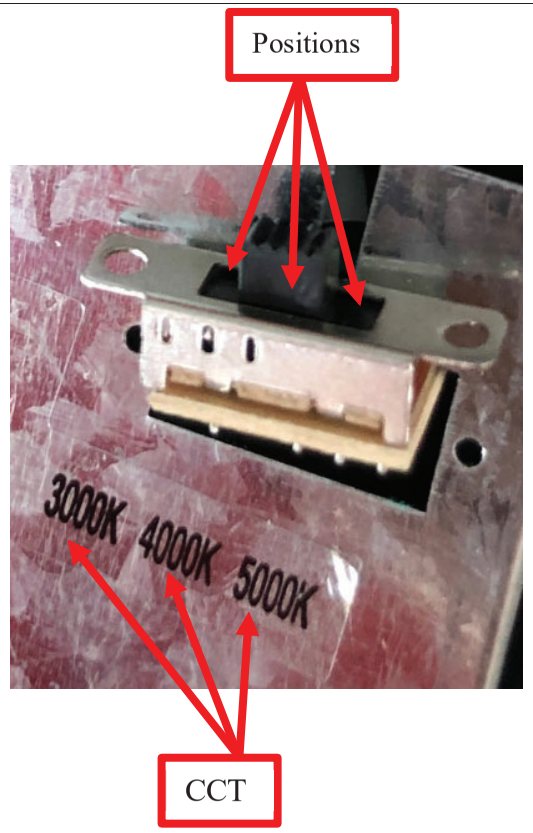
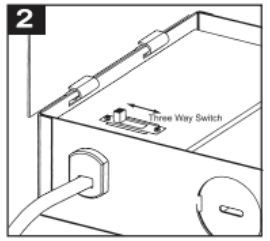


2. Open the hardwire box cover. Adjust the color temperature (3000K/4000K/5000K) according to your preference.



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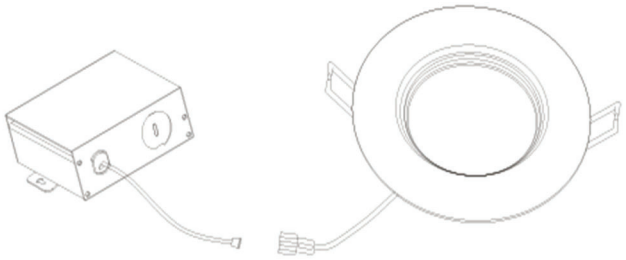
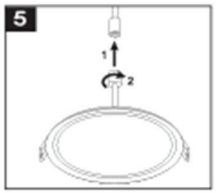


X 3 X 3

4. Insert hardwire box through the mounting hole.

5. Connect the male plug to the female plug secure the connector.



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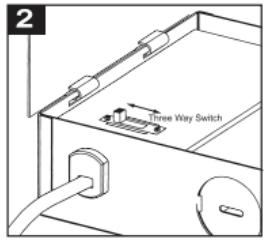
U.S. Patent No. 10,299,336	
Claim 3	**SKU#: 349-1292**
[3.pre] The luminaire of claim 1,	*See, e.g.*, Claim 1, *supra*, which is incorporated by reference herein.
[3.a] wherein each position of the plurality of positions is discrete.	In the 349-1292 product, each position of the plurality of positions is discrete. For example, the switch in the 349-1292 product has three discrete positions, each corresponding to a discrete correlated color temperature (CCT) selection (3000K/4000K/5000K) for emitted light. 

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	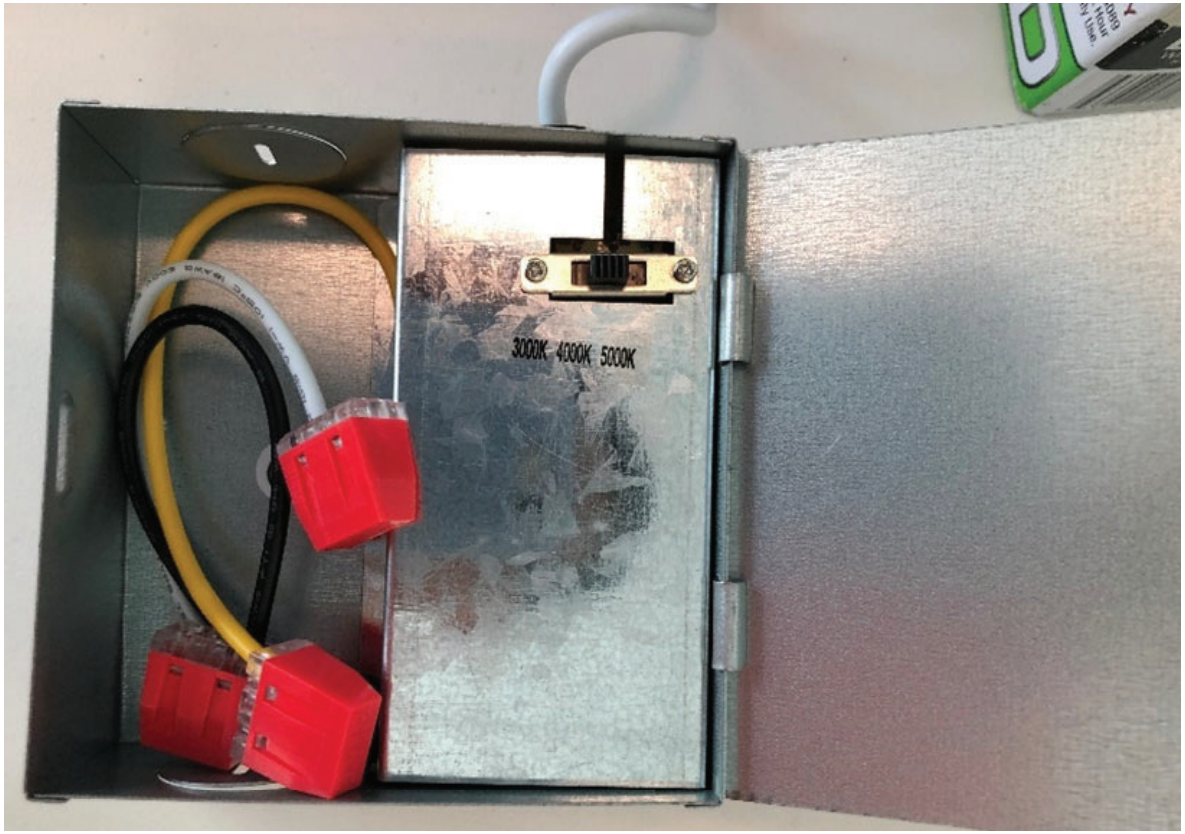

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U.S. Patent No. 10,299,336	
Claim 7	**SKU#: 349-1292**
[7.pre] The luminaire of claim 1, further comprising:	*See, e.g.*, Claim 1, *supra*, which is incorporated by reference herein.
[7.a] a junction box comprising at least one wall that forms a second cavity,	The 349-1292 product includes a junction box comprising at least one wall that forms a second cavity. For example, the 349-1292 product includes a junction box that comprises walls including side and bottom walls which form a second cavity within the junction box.

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[7.b] wherein the switch is disposed within the second cavity,	In the 349-1292 product, the switch is disposed within the second cavity. For example, the CCT selection switch in the 349-1292 product is disposed within the second cavity formed inside the junction box.

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	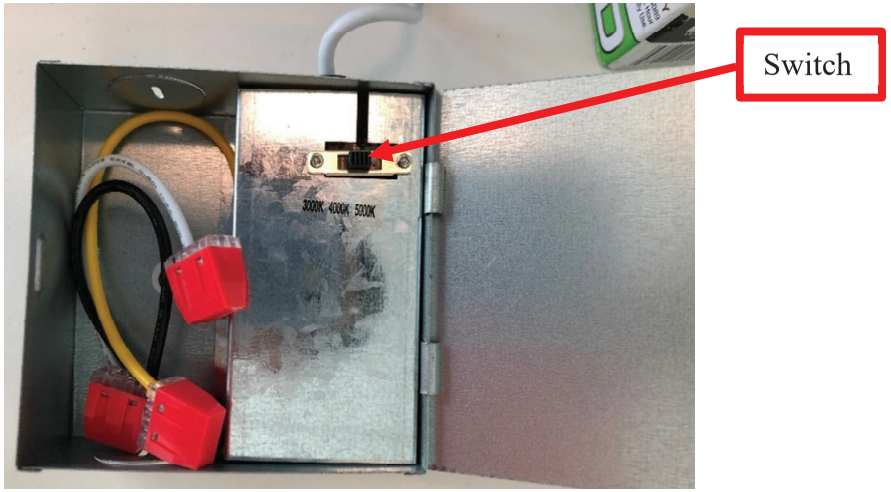
[7.c] wherein the second end of the electrical cable is coupled to the switch.	In the 349-1292 product, the second end of the electrical cable is coupled to the switch. For example, the second end of the electrical cable in the 349-1292 product enters the junction box and couples to components within the junction box including the CCT selection switch.

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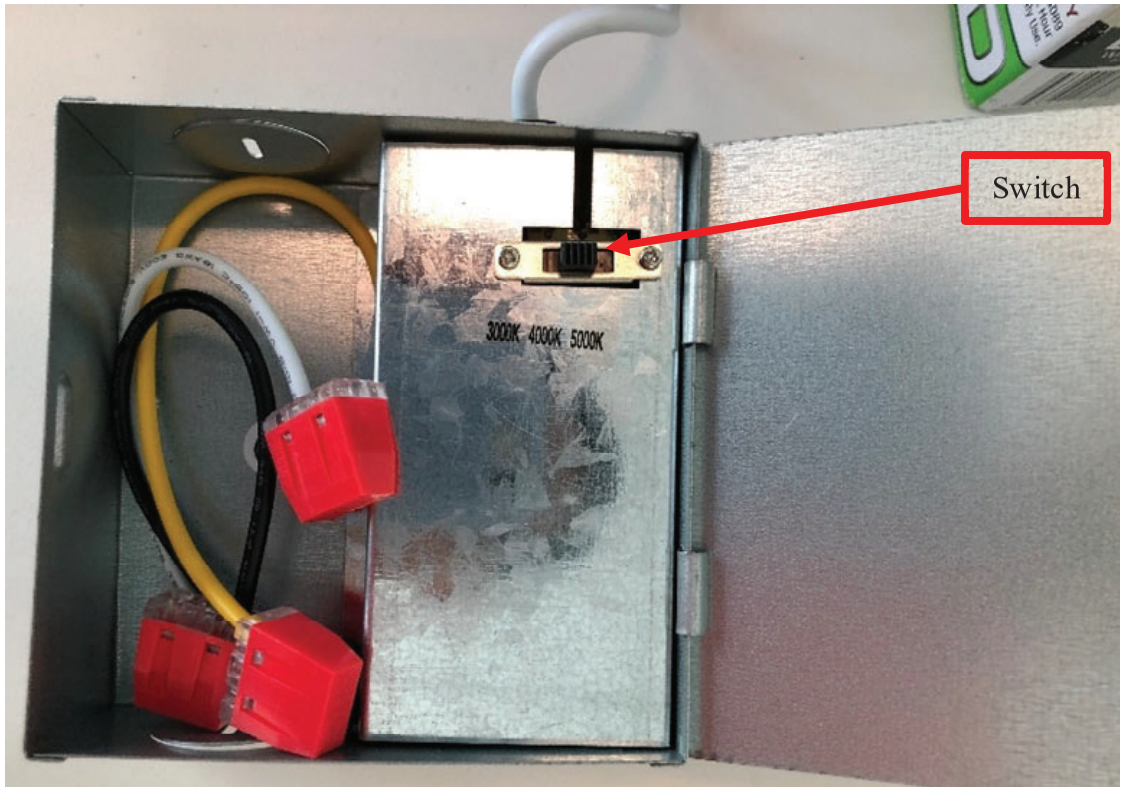
U.S. Patent No. 10,299,336	
Claim 9	**SKU#: 349-1292**
[9.pre] The luminaire of claim 1,	*See, e.g.*, Claim 1, *supra*, which is incorporated by reference herein.
[9.a] wherein the switch is a slide switch.	In the 349-1292 product, the switch is a slide switch. For example, the CCT selection switch in the 349-1292 product is a slide switch. 

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U.S. Patent No. 10,299,336	
Claim 11	**SKU#: 349-1292**
[11.pre] The luminaire of claim 1,	*See, e.g.*, Claim 1, *supra*, which is incorporated by reference herein.
wherein the switch is inaccessible when the housing is installed.	In the 349-1292 product, the switch is inaccessible when the housing is installed. For example, the CCT selection switch in the 349-1292 product is disposed in the interior of a junction box that includes a lid. When the housing (downlight fixture) is installed, the junction box remains within the ceiling and is obstructed by the downlight fixture, rendering the CCT selection switch provided within the junction box inaccessible. Additionally, the junction box's lid remains closed upon installation of the downlight, thereby further rendering the CCT selection switch inaccessible. The installation instructions for the 349-1292 product also explain that the CCT should be set for the downlight prior to installation into the ceiling.

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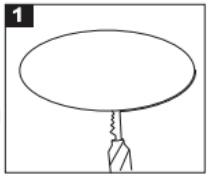
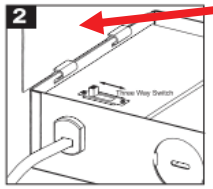
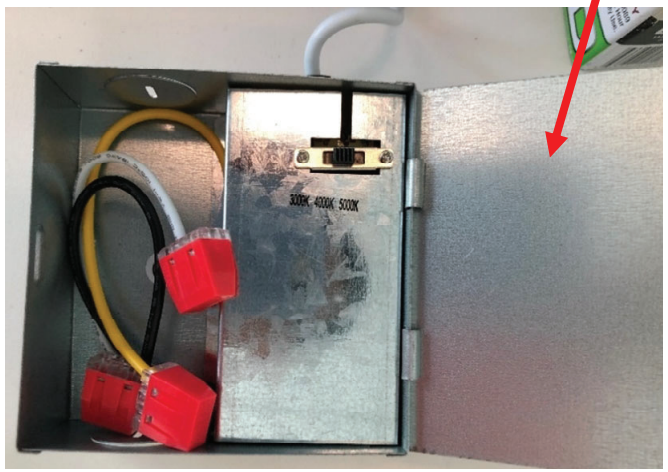
1. Locate a suitable position to place the fixture and open in accordance to the cut-hole dimensions.
A template is provided to assist in properly locating and cutting the hole.

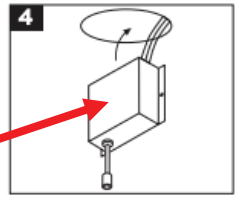


2. Open the hardwire box cover. Adjust the color temperature (3000K/4000K/5000K) according to your preference.

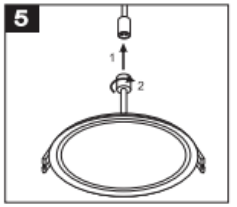




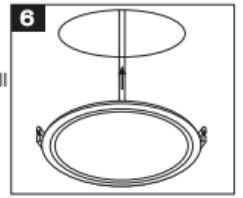
4. Insert hardwire box through the mounting hole.



5. Connect the male plug to the female plug secure the connector.



6. Push spring loaded clips on the fixture upwards and insert fixture base into the mounting hole.Release the clips and pull the fixture to the ceiling.



Turn on the power at fuse or circuit box.

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U.S. Patent No. 10,299,336	
Claim 12	**SKU#: 349-1292**
[12.pre] The luminaire of claim 1,	*See, e.g.*, Claim 1, *supra*, which is incorporated by reference herein.
[12.a] wherein the switch is accessible to a user when the housing is removed from its installed location.	In the 349-1292 product, the switch is accessible to a user when the housing is removed from its installed location. For example, the housing (downlight fixture) of the 349-1292 product is installed over the mounting hole in the ceiling by spring loaded clips, allowing removal of the housing. After the housing is removed, the junction box is accessible, whereby the CCT selection switch within the junction box is then also accessible.

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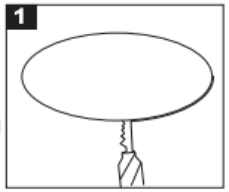
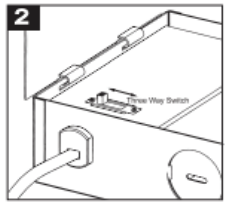
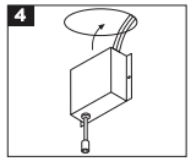
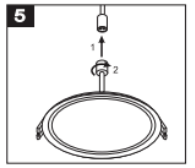
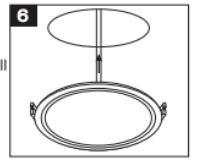
	1. Locate a suitable position to place the fixture and open in accordance to the cut-hole dimensions. A template is provided to assist in properly locating and cutting the hole.  2. Open the hardwire box cover. Adjust the color temperature (3000K/4000K/5000K) according to your preference.  4. Insert hardwire box through the mounting hole.  5. Connect the male plug to the female plug secure the connector.  6. Push spring loaded clips on the fixture upwards and insert fixture base into the mounting hole.Release the clips and pull the fixture to the ceiling.  Turn on the power at fuse or circuit box.
U.S. Patent No. 10,299,336	
Claim 13	**SKU#: 349-1292**

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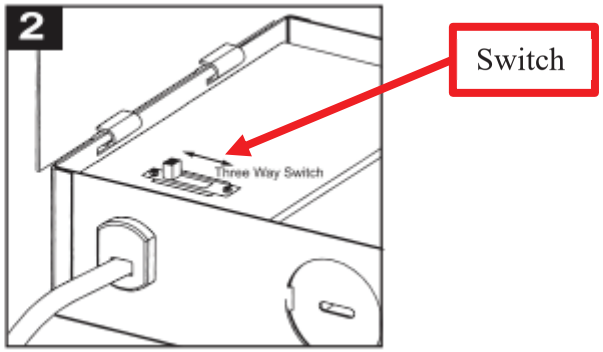
[13.pre] A switch for controlling a correlated color temperature (CCT) of light emitted by a luminaire, the switch comprising:	The 349-1292 product includes a switch for controlling a correlated color temperature (CCT) of light emitted by a luminaire. For example, the 349-1292 product includes a three-way switch in a hardwire junction box for controlling whether the products output light at a color temperature of 3000K, 4000K, or 5000K. **Features** • This LED light has a CRI of 80, three color temperatures of 3000K, 4000K, and 5000K, and is 700 lumens • Wafer baffle trim with white finish • Type IC rated for direct contact with insulation • Directly install to the ceiling for instant bright light • Dimmable with compatible dimmer to enhance your control over the ambiance in your space. 2. Open the hardwire box cover. Adjust the color temperature (3000K/4000K/5000K) according to your preference.  https://www.menards.com/main/lighting-ceiling-fans/indoor-lighting/recessed-lights/patriot-lighting-reg-6-led-ultra-thin-downlight-3-pack/91288/lighting-ceiling-fans/indoor-lighting/recessed-lights/patriot-lighting-reg-6-led-ultra-thin-downlight-3-pack/91288/p-1567578524821-c-7499.htm

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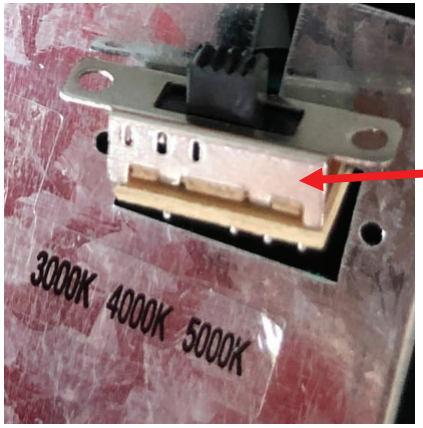
[13.a] a body;	The switch of the 349-1292 product includes a body. For example, the three-way switch of the 349-1292 product includes a metal body. 

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[13.b] at least one first coupling feature disposed on the body, wherein the at least one first coupling feature is configured to electrically couple to an electrical cable of the luminaire; and	The switch of the 349-1292 product includes at least one first coupling feature disposed on the body, wherein the at least one first coupling feature is configured to electrically couple to an electrical cable of the luminaire. For example, the three-way switch of the 349-1292 product includes metal pins disposed on the body, the pins electrically coupling to an electrical cable of the luminaire via a circuit board.

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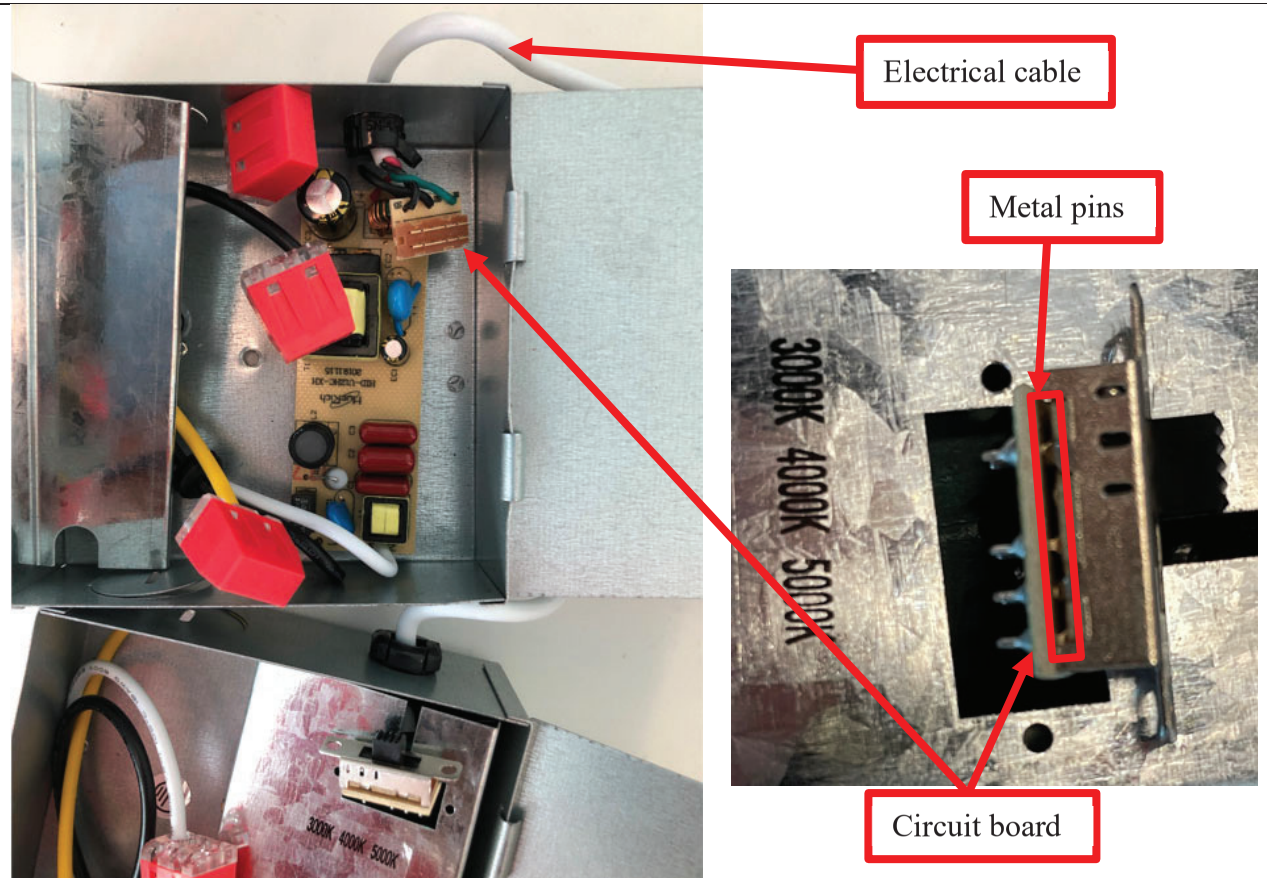

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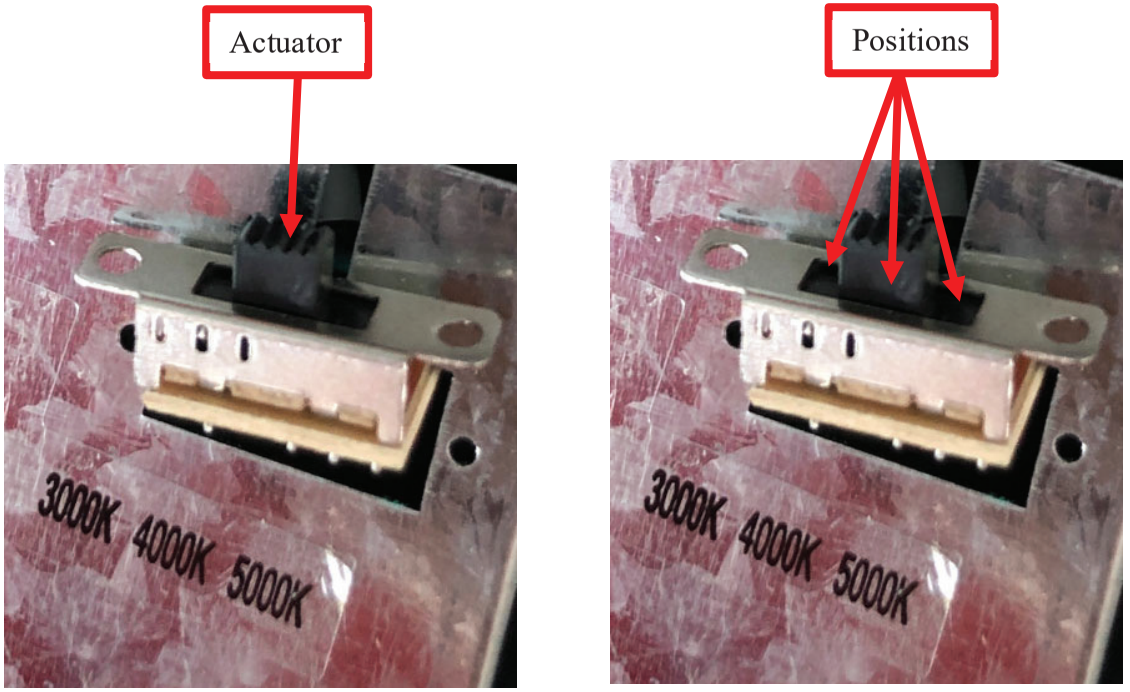
[13.c] an actuator disposed on the body, wherein the actuator has a range of positions,	The switch of the 349-1292 product includes an actuator disposed on the body, wherein the actuator has a range of positions. For example, the three-way switch of the 349-1292 product includes an actuator disposed on and extending from the body, the actuator having three positions. 

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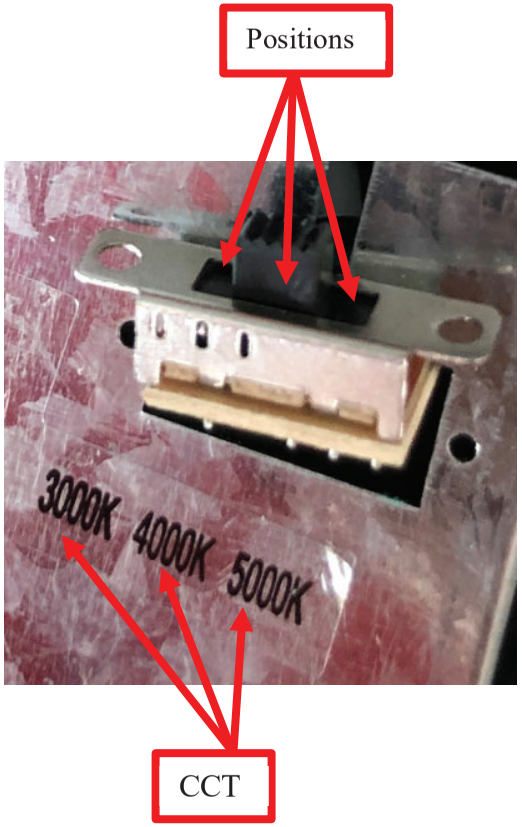
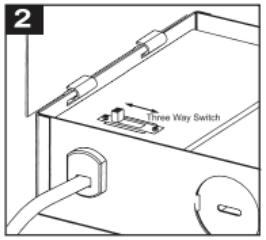
[13.d] wherein each position of the range of positions of the actuator corresponds to a CCT of the light emitted by the luminaire.	In the switch of the 349-1292 product, each position of the range of positions of the actuator corresponds to a CCT of the light emitted by the luminaire. For example, the three-way switch of the 349-1292 product includes three positions, one corresponding to a correlated color temperature (CCT) of 3000K, one corresponding to a CCT of 4000K, and one corresponding to a CCT of 5000K.  2. Open the hardwire box cover. Adjust the color temperature (3000K/4000K/5000K) according to your preference. 

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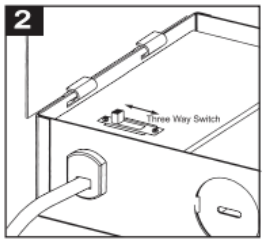
U.S. Patent No. 10,299,336	
Claim 15	**SKU#: 349-1292**
[15.pre] The switch of claim 13,	*See, e.g.*, Claim 13, *supra*, which is incorporated by reference herein.
[15.a] wherein each position is discrete within the range of positions.	In the switch of the 349-1292 product, each position is discrete within the range of positions. For example, each position of the switch in the 349-1292 product is one of three discrete positions within the range of the three positions. 2. Open the hardwire box cover. Adjust the color temperature (3000K/4000K/5000K) according to your preference. 

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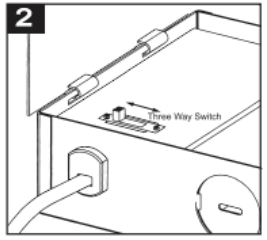
U.S. Patent No. 10,299,336	
Claim 19	**SKU#: 349-1292**
[19.pre] The switch of claim 13,	*See, e.g.*, Claim 13, *supra*, which is incorporated by reference herein.
[19.a] wherein the body is configured to be disposed within a junction box.	In the switch of the 349-1292 product, the body is configured to be disposed within a junction box. For example, the body in the 349-1292 product is disposed within a junction box. 2. Open the hardwire box cover. Adjust the color temperature (3000K/4000K/5000K) according to your preference. 

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