

From: [Andrew Brown](#)
To: [Trials](#); [McMahon, Charles](#); [Savant IPR Service](#); [FeitElectricIPR](#)
Cc: [Trials](#)
Subject: Re: IPR2024-01357: Patent Owner Request for Additional Discovery
Date: Wednesday, March 25, 2026 3:32:34 PM
Attachments: [image001.png](#)
[Proposed Discovery Requests.pdf](#)

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Mr. Kellogg,

For the Board's reference, here is a copy of Patent Owner's proposed discovery requests.

Respectfully,
Andy Brown
Counsel for Petitioners

Andrew S. Brown
Radulescu LLP | [Of Counsel](#)

212-713-0356
andy@radip.com

From: Trials <Trials@USPTO.GOV>
Date: Wednesday, March 25, 2026 at 1:21 PM
To: McMahon, Charles <CMcMahon@beneschlaw.com>, Trials <Trials@USPTO.GOV>, Savant_IPR_Service <Savant_IPR_Service@radip.com>, FeitElectricIPR <FeitElectricIPR@beneschlaw.com>
Cc: Trials <Trials@USPTO.GOV>
Subject: RE: IPR2024-01357: Patent Owner Request for Additional Discovery

Counsel,

A conference call has been scheduled for 9:00 am Eastern tomorrow, March 26. The dial in number is 540-566-5633 and the passcode is 388672621#

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
(571) 272-5366



From: McMahon, Charles <CMcMahon@beneschlaw.com>
Sent: Wednesday, March 25, 2026 11:03 AM
To: Trials <Trials@USPTO.GOV>; Savant_IPR_Service <Savant_IPR_Service@radip.com>; FeitElectricIPR <FeitElectricIPR@beneschlaw.com>
Cc: Trials <Trials@USPTO.GOV>
Subject: Re: IPR2024-01357: Patent Owner Request for Additional Discovery

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Dear Honorable Board,

After conferring, the parties confirm that they are generally available at the Board's convenience this week.

Respectfully submitted,
Charles McMahon
Counsel for Patent Owner



Charles M. McMahon
Partner
Benesch Friedlander Coplan & Aronoff LLP

t: [872.302.6466](tel:872.302.6466) | m: [773.255.9925](tel:773.255.9925)
CMcMahon@beneschlaw.com | [vCard](#) | [Bio](#) | www.beneschlaw.com
71 South Wacker Drive, Suite 1600, Chicago, IL 60606-4637

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From: Trials <Trials@USPTO.GOV>
Date: Tuesday, March 24, 2026 at 12:48 PM
To: McMahon, Charles <CMcMahon@beneschlaw.com>, Savant_IPR_Service <Savant_IPR_Service@radip.com>, FeitElectricIPR <FeitElectricIPR@beneschlaw.com>
Cc: Trials <trials@uspto.gov>
Subject: RE: IPR2024-01357: Patent Owner Request for Additional Discovery

Counsel,

Please confer and jointly respond with your mutual availability for a conference call this

week.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
(571) 272-5366



From: McMahon, Charles <CMcMahon@beneschlaw.com>
Sent: Tuesday, March 24, 2026 1:22 PM
To: Trials <Trials@USPTO.GOV>
Cc: Savant_IPR_Service <Savant_IPR_Service@radip.com>; FeitElectricIPR <FeitElectricIPR@beneschlaw.com>
Subject: IPR2024-01357: Patent Owner Request for Additional Discovery

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Dear Honorable Board,

Patent Owner Feit Electric Company, Inc. requests a conference with the Board in order to request additional discovery and briefing relating to its pending Motion to Terminate based on Failure to Disclose an RPI (IPR2024-01357 Paper 57). On January 30, 2026, the Board granted Patent Owner leave to file its motion, which was filed on February 6, 2026. Petitioners filed an opposition on February 20, 2026 (Paper 58), which included a declaration from Andrew Martin (Paper 59), a corporate representative of Petitioner LEDVANCE LLC. The Martin Declaration adds new facts not previously addressed in Patent Owner's motion. As the Board noted during the recent oral argument, Patent Owner is entitled to cross examine Mr. Martin pursuant to Rule 42.51(b)(1)(ii). In connection with that cross examination, Patent Owner seeks permission to: (1) prior to the deposition, serve document requests on Petitioner LEDVANCE LLC relating to LEDVANCE's corporate structure (consistent with Corning Optical Comm's RF, LLC v. PPC Broadband Inc., IPR2014-00440, Paper 68 (PTAB Aug. 18, 2015) (precedential)); and (2) submit a reply to Paper 58. After conferring with Petitioners, Patent Owner understands that they oppose the request.

Petitioner LEDVANCE LLC, responds that it has already provided evidence regarding its corporate structure, consistent with Corning Optical, via the sworn testimony of its General Counsel. PO may challenge that testimony through routine cross-examination. But the availability of routine cross-

examination under Rule 42.51(b)(1) does not imply the availability of broad additional discovery under Rule 42.51(b)(2). LEDVANCE offered to produce an entity organization chart to resolve this dispute, after which Feit provided its proposed document requests. PO's proposed document requests are not narrowly tailored. Moreover, they seek discovery from entities that are not parties to these proceedings. PO's request for additional discovery is an inappropriate discovery fishing expedition and should be denied under the Garmin factors.

Respectfully submitted,
Charles McMahon
Counsel for Patent Owner



Charles M. McMahon
Partner
Benesch Friedlander Coplan & Aronoff LLP

t: [872.302.6466](tel:872.302.6466) | m: [773.255.9925](tel:773.255.9925)
CMcMahon@beneschlaw.com | [vCard](#) | [Bio](#) | www.beneschlaw.com
71 South Wacker Drive, Suite 1600, Chicago, IL 60606-4637

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