

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

FEIT ELECTRIC COMPANY, INC.,

Plaintiff,

v.

SAVANT TECHNOLOGIES LLC
d/b/a GE LIGHTING,

Defendant.

Case No. 1:24-cv-00473-BMB

**PLAINTIFF’S FINAL
CLAIM CONSTRUCTIONS AND SUPPORTING MATERIALS**

Pursuant to the Court’s Case Management Order (Dkt. 19-1) and LPR 4.2(c), Plaintiff Feit Electric Co., Inc. (“Feit Electric”) hereby provides the following final claim constructions for the terms identified in the parties’ exchanges under LPR 4.1 and 4.2 (the “Identified Terms”) from the asserted claims of U.S. Patent No. 8,604,678 (the “’678 patent”).

Term	’678 Patent Claim(s)	Construction	Support
“improves an off-state white appearance of the wavelength conversion component” / “improves an OFF state white appearance of the wavelength conversion component”	1, 19, 29	Plain and ordinary meaning	’678 Patent at 1:64-2:16; 3:15-18; 3:65-67; 4:5-8; 4:21-26; 6:39-41; 6:58-61; 8:9-55; 9:47-55; 10:59-12:12; 13:45-49; 15:58-16:4; 16:56-17:2; 17:43-60; 18:57-60; 22:34-48; 25:52-67; FIGs 1-3, 9, 10, 16-24; December 23, 2012 Response to Office Action.

Term	'678 Patent Claim(s)	Construction	Support
“the light scattering material will scatter the excitation light relatively more than the light scattering material will scatter light generated by the at least one photoluminescence material”	11	Plain and ordinary meaning	'678 Patent at Abst.; 3:8-9; 3:24-28; 4:8-21; 6:30-31; 11:63-12:12; 14:4-41; 15:58-16:46; 16:56-17:2; 17:14-33; 17:46-60; 18:66-19:16; 19:22-28; 20:12-19; 21:44-59; 22:34-47; FIGs. 10, 14
“wherein the light scattering material scatters the excitation light at least twice as much as light generated by the at least one photoluminescence material”	12	Plain and ordinary meaning	'678 Patent at Abst.; 3:8-9; 3:24-28; 4:8-21; 6:30-31; 11:63-12:12; 14:4-41; 15:58-16:46; 16:56-17:2; 17:14-33; 17:46-60; 18:66-19:16; 19:22-28; 20:12-19; 21:44-59; 22:34-47; FIGs. 10, 14
“corresponds to an average particle size that improves the OFF state white appearance of the wavelength conversion component”	21	Plain and ordinary meaning	'678 Patent at 1:64-2:16; 3:15-35; 3:65-4:26; 6:39-41; 6:58-61; 8:9-55; 9:47-55; 10:59-12:12; 15:58-16:4; 16:56-17:2; 17:43-60; 18:57-60; 22:34-48; 25:52-67; FIGs 1-3, 9, 10, 16-24; December 23, 2012 Response to Office Action.
“light mixing chamber”	29	Plain and ordinary meaning	'678 Patent at 24:49-25:43; FIGs. 15, 16, 20A, 20B, 20C, 21A, 21B, 21C, 23A, 23B.
“planar shapes”	25	Plain and ordinary meaning	'678 Patent at 8:9-18; 22:22-26; 24:6-12; 25:20-34; FIGs. 1, 20A, 20B, 20C, 21A, 21B, 21C; 23A, 23B.

Feit Electric reserves the right to rely upon expert testimony in support of its proposed constructions, including those opinions and statements presented during claim construction expert discovery in this case, including without limitation the Opening Claim Construction Declaration of E. Fred Schubert dated November 6, 2024, the Rebuttal Claim Construction Declaration of E. Fred Schubert dated November 11, 2024, and all documents and things cited therein.

Furthermore, Feit Electric reserves the right to rely on additional intrinsic and extrinsic evidence in its claim construction briefing, including but not limited to portions of the intrinsic record and extrinsic evidence cited by Defendant Savant Technologies LLC d/b/a GE Lighting (“Savant”). Additionally, Feit Electric reserves its right to rely on any figures, tables, examples, or any reference incorporated by reference in cited portions of the patent-in-suit or the respective file history, even if not explicitly referred to herein.

Feit Electric reserves the right to modify its constructions at a later date, including but not limited to, in response to any alternative constructions proposed by Savant.

Dated: December 10, 2024

Respectfully submitted,

BENESCH FRIEDLANDER
COPLAN & ARONOFF LLP

/s/ Thomas M. DaMario
Michael S. Weinstein
127 Public Square, Suite 4900
Cleveland, OH 44114
Tel: (216) 363-4500
mweinstein@beneschlaw.com

Simeon G. Papacostas (*pro hac vice*)
Thomas M. DaMario (*pro hac vice*)
71 South Wacker Drive, Suite 1600
Chicago, IL 60606
Tel: (312) 212-4949
spapacostas@beneschlaw.com
tdamario@beneschlaw.com

Attorneys for Feit Electric Company, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on December 10, 2024, a true and correct copy of the foregoing document was served upon all counsel of record via email.

/s/ Thomas M. DaMario
Thomas M. DaMario

An Attorney for Feit Electric Company, Inc.