

**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,

Civil Action No. 1:24-cv-00473-BMB

**DEFENDANT SAVANT TECHNOLOGIES LLC'S
FINAL PROPOSED CONSTRUCTIONS AND EVIDENCE**

Pursuant to Local Patent Rule 4.2(c), the parties' Joint Motion for Leave to Amend the Case Management Order (D.I. 42), and the Court's January 7, 2025 Order, defendant Savant Technologies LLC ("Savant"), by and through its undersigned counsel, hereby provides its final proposed claim constructions with respect to U.S. Patent No. 8,614,539.

Savant's final proposed constructions for each disputed term and the identification of supporting evidence is provided in Exhibit A.

Savant's presentation of a final proposed claim construction is not intended, and should not be construed, as a waiver of any argument. Savant's proposed final constructions for disputed terms, clauses, and claim elements are based on information that is currently available to Savant and information derived from Feit's Infringement and Validity Contentions. In the event that Feit amends its Infringement and Validity Contentions, or should other terms, clauses, and claim elements become relevant, Savant reserves the right to modify this disclosure. Savant also reserves the right to modify this disclosure should additional information become available through discovery. Further, Savant reserves the right to modify this disclosure once it has reviewed Feit's final claim constructions (pursuant to Local Patent Rule 4-2) and in light of arguments made or positions taken by Feit as this case proceeds.

Savant submits its final proposed identification of evidence supporting, describing, or explaining its final proposed claim constructions in Exhibit A and reserves the right to amend or supplement same. Savant also reserves the right to present extrinsic evidence, whether or not identified in Exhibit A, including but not limited to dictionary definitions and citations to learned treatises, in rebuttal to any extrinsic evidence Feit offers to support any claim construction proposed in any claim construction hearing or attendant briefing. Savant reserves the right to

supplement, revise, or otherwise amend the list of evidence in Exhibit A. Savant further reserves the right to rely on any evidence identified or raised by Feit at any point during the claim construction process.

Dated: February 25, 2025

Respectfully submitted,

/s/Jonathan Auerbach

Joshua A. Friedman (0091409)

Ronald M. McMillan (0073247)

CALFEE, HALTER & GRISWOLD LLP

The Calfee Building

1405 East Sixth Street

Cleveland, Ohio 44114

(216) 622-8200

(216) 241-0816 (fax)

jfriedman@calfee.com

rmcmillan@calfee.com

David C. Radulescu, Ph.D. (*pro hac vice*)

Etai Lahav (*pro hac vice*)

Jonathan Auerbach (*pro hac vice*)

RADULESCU LLP

5 Penn Plaza, 19th Floor

New York, NY 10001

Tel.: (646) 502-5950

Fax: (646) 502-5959

david@radip.com

etai@radip.com

jonathan@radip.com

Attorneys for Defendant

Savant Technologies LLC

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument was served via electronic mail to all counsel of record on February 25, 2025.

/s/Mindy Tsoi
Mindy Tsoi
Senior Patent Paralegal

EXHIBIT A

Claim number(s)	Claim Term	Final Proposed Construction	Intrinsic & Extrinsic Evidence
1, 18, 28	“average particle size”	Indefinite	‘539 Patent, 3:15-35, 3:65-4:26, 8:5-55, 11:37-12:12, 17:43-60, Figure 10 Rawles, <i>Basic Principles of Particle Size Analysis</i>, Malvern Instruments Limited Testimony of William A. Doolittle, including the November 6 and 20, 2024 declarations
1, 18, 28	“the light scattering material will scatter excitation light from a radiation source relatively more than the light scattering material will scatter light generated by the at least one photoluminescence material” / “the light scattering material will scatter excitation light from the at least one solid-state light emitter relatively more than the light scattering material will scatter light generated by the at least one photoluminescence material” / “the light scattering material will scatter excitation light from the one or more solid-state light emitters relatively more than the light scattering material will	Indefinite	‘539 Patent, 5:34-35, 11:63-65, 17:43-60, 25:57-62 Figure 10 Testimony of William A. Doolittle, including the November 6 and 20, 2024 declarations

EXHIBIT A

Claim number(s)	Claim Term	Final Proposed Construction	Intrinsic & Extrinsic Evidence
1, 18, 28	scatter light generated by the at least one photoluminescence material” “the light scattering material scatters the blue light at least twice as much as light generated by the at least one photoluminescence material”	Indefinite	‘539 Patent, 4:4-8, 11:37-12:12, Figure 10 Testimony of William A. Doolittle, including the November 6 and 20, 2024 declarations
10, 24	“planar shapes”	a shape that is substantially two-dimensional (i.e. flat)	‘539 Patent, 22:22-26, 25:21-30; Figures 20A-C, 21A-C; Claims 25, 26. 2003 Meriam Webster Collegiate Dictionary, definition of “planar” 2006 American Heritage Dictionary of the English Language, definition of “planar” Testimony of William A. Doolittle, including the November 6 and 20, 2024 declarations
20	“improve an OFF state white appearance of the light emitting device”	Indefinite	‘539 Patent, 1:64-65, 2:6-14, 3:15-19, 3:65-66, 6:39-41, 11:4-10, 11:19-27, 11:33-36, 18:57-60, 20:3-7, 21:56-61, 22:45-48, 23:8-

EXHIBIT A

Claim number(s)	Claim Term	Final Proposed Construction	Intrinsic & Extrinsic Evidence
			11, 24:2-5, 24:35-39, 25:65-26:4, Figures 2, 3, 17-21 Testimony of William A. Doolittle, including the November 6 and 20, 2024 declarations
28	“light mixing chamber”	an interior volume separate from the wavelength conversion component	‘539 Patent, 19:46-48, 19:62-64, 24:49-25:45; Figures 16, 18, 19, 20A-C, 21A-C, 23B. 2004 Wiley Elec. & Elec. Engineering Dictionary, definition of “chamber” 2007 Collins Dictionary of Science and Technology, definition of “chamber” Testimony of William A. Doolittle, including the November 6 and 20, 2024 declarations