

January 25, 2024

VIA E-MAIL

Christina Lyons, Esq.
Chief Legal Counsel
AGS Lighting Management, LLC
14701 Saint Mary's Lane, Suite 625
Houston, Texas 77079

Re: *U.S. Patent No. 11,751,302*

Dear Ms. Lyons:

We appreciate your courtesy in extending the deadline to permit us to investigate the above-referenced patent as it relates to Jesco Lighting Group LLC's ("Jesco") LIN product.

As an initial matter, we note that Jesco does not manufacture the subject LIN product, but rather purchases this product from Sundopt LED Lighting Co., Ltd, Bldg 8-6#, TongFuYu Industrial Park Ai Qun Rd Shiyan Town Baoan District Shenzhen, Guangdong 518108 China ("Sundopt"). Accordingly, should AGS Lighting Management LLC ("AGS") have any issues with this product, we would suggest that AGS take this matter up with Sundopt.

Moreover, we understand that Sundopt is currently supplying the subject product to a number of other U.S. lighting companies.

In any event, upon our further review of the matter, it is our opinion that the subject LIN product does not infringe any valid claim of *U.S. Patent 11,751,302*.

In particular, we believe the claims of *U.S. Patent 11,751,302* to be clearly invalid over certain prior art, including the LED lighting apparatus described in *LEDBARKIT-INTERNAL DRIVER (LBI)* published by Light Efficient Design March 17, 2020 and shown in the YouTube video "LED Cast Episode-3" published by Light Efficient Design on April 1, 2020 and available at <https://youtu.be/STs6Bm0emFo?t=550>.

Attached for your information is a screen shot from the aforementioned YouTube video showing a 2 foot long LEDBARKIT-INTERNAL DRIVER (LBI) product electrically coupled to a 3 foot long LEDBARKIT-INTERNAL DRIVER (LBI) in a commercial installation in New Hampshire.

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As you can see from the attached screen shot and YouTube video, the electrically coupled 2 foot long and 3 foot long prior art LEDBARKIT-INTERNAL DRIVER (LBI) have a matching lumen output and color temperature.

Accordingly, we will consider this matter closed.

If AGS is of a different opinion, please let us have your detailed explanation of how the claims of *U.S. Patent 11,751,302* patentably distinguish over the products indicated above.

Yours sincerely,
COLLARD & ROE, P.C.

A handwritten signature in black ink, appearing to read 'Fred Dorchak', with a stylized flourish at the end.

Frederick J. Dorchak

FJD:ko
Attachment