
From: David Radulescu <david@radip.com>
Sent: Thursday, March 7, 2024 11:34 AM
To: Peter DallePezze; Christina Lyons
Cc: Paulin Tham; piana@fyiplaw.com
Subject: U.S. Patent 11,751,302/Jesco LIN Product
Attachments: LIN-DI_Specs.pdf; JESCO Model LIN Mar 7 2024.pdf

Hi Peter & Christina— I believe we previously met at one of my LED lighting industry patent talks. Hope you are both doing well.

I have been engaged to represent Jesco going forward in connection with AGS Lighting Management, LLC's allegation that the Jesco LIN LED product infringes U.S. Patent No. 11,751,302. (AGS Oct 31, 2023 letter to Jesco). I have reviewed the correspondence between the parties/counsel, the '302 patent, as well as the design/specification of the accused LIN product. Can we set a time to discuss this matter at your convenience? Please let me know what time works for you guys. I'd like to make sure Ms. Tham is available so that we can continue the prior discussions.

Also, please confirm that AGS has not provided any claim chart showing how it believes its '302 patent reads on the Jesco LIN product. A spec sheet for the Jesco LIN product is attached along with some photographs of one of the accused products that I have in my possession. Given that it is my understanding the driver for the LIN product does not provide a plurality of output currents, can you please be prepared to discuss your allegation of infringement on our call, including the requirement that the accused product include a "driver circuit configured to output a . . . plurality of currents"? If you believe it would be more efficient to provide a claim chart showing your theory of infringement, I'd be more than happy to consider the chart in advance of the meeting.

Best regards,

David C. Radulescu, Ph.D.
Radulescu LLP | Partner

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LIN-DI

LED LINEAR DIRECT/INDIRECT LINEAR LIGHTING



Fixture Type	
Project	
Notes	



Field Adjustable CCT
3000K-3500K-4000K

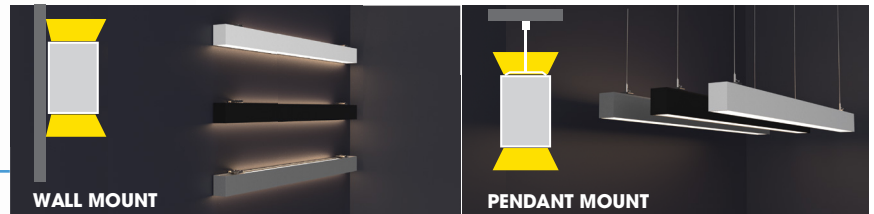
JESCO's LIN Series is a versatile linear lighting system with a modern aesthetic, offering a uniform light distribution that meets a variety of design needs, whether the project calls for pendant mounting, surface mounting, wall mounting or a combination thereof. The LIN Series of extra-rigid sleek aluminum housing in 8ft, 4ft and 2ft lengths, may be easily connected to form long linear runs.

Straight runs can be combined with preassembled lit-connectors in X, L and T configurations to create intricate patterns and forms. An easily accessible, on-board, CCT toggle switch allows users to select, and later change, between 3000K/3500K/4000K color temperatures. An opal polycarbonate lens offers perfect diffusion.



SPECIFICATIONS

INPUT VOLTAGE	Universal 120-277V AC
WATTAGE	24 - 20W 48 - 40W 72 - 60W 96 - 80W
LUMENS	Up to 1319 Lm/ft @ 3500K
CRI	90+
BEAM ANGLE	DIRECT: 110° INDIRECT: 140° batwing
DIMMING ¹	0-10V, RF see page 7
	CASAMBI READY see page 8



DIMENSIONS	2 1/2" W x 3 3/8" H 63mm W x 88mm H
LENGTH OPTIONS	24 - 24 1/2" 48 - 47 1/4" 72 - 70 7/8" 96 - 94 1/2"
MAX CONNECTED LENGTH	120V - 80Ft / 277V - 184Ft
ENVIRONMENT	Indoor - Dry
CERTIFICATIONS	cETLus Listed
WARRANTY ²	5 Years

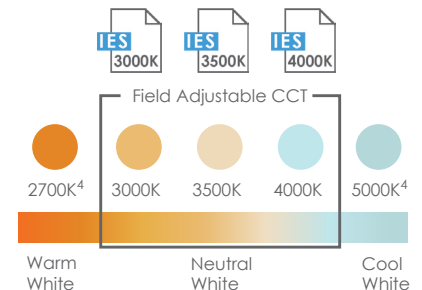
¹ Effectively dim down to 5% on linear runs, 10% on runs with lit connectors.

² See published warranty terms for detailed information

PERFORMANCE

	24 -20W		48 -40W		72 -60W		96 -80W		EFFICACY	CRI
CCT ³	DIRECT	INDIRECT	DIRECT	INDIRECT	DIRECT	INDIRECT	DIRECT	INDIRECT		
3000K	1895 Lm	683 Lm	3790 Lm	1365 Lm	5805 Lm	1935 Lm	7580 Lm	2730 Lm	129 Lm/W	90+
3500K	1915 Lm	723 Lm	3830 Lm	1446 Lm	5940 Lm	1980 Lm	7660 Lm	2982 Lm	132 Lm/W	90+
4000K	1879 Lm	695 Lm	3757 Lm	1390 Lm	5805 Lm	1935 Lm	7514 Lm	2780 Lm	129 Lm/W	90+
2700K ⁴	1890 Lm	630 Lm	3780 Lm	1260 Lm	5670 Lm	1890 Lm	7560 Lm	2520 Lm	126 Lm/W	90+
5000K ⁴	1950 Lm	650 Lm	3900 Lm	1300 Lm	5850 Lm	1950 Lm	7880 Lm	2600 Lm	130 Lm/W	90+

³ CCT within +/-10%



ORDERING INFO

SERIES	LENGTH	CCT	LENS	FINISH
LIN-DI	72	D5000	OP	
	24 - 2FT 20W	DSW1 - 3000K/3500K/4000K selectable	OP - OPAL	WH - WHITE
	48 - 4FT 40W	D2700 ⁴ - 2700K 90CRI		BK - BLACK
	72 - 6FT 60W	D5000 ⁴ - 5000K 90CRI		SV - SILVER
	96 - 8FT 80W			
SERIES	LIT CONNECTOR	CCT	LENS	FINISH
LIN-DI		D5000	OP	
	L - 90° L SHAPED	DSW1 - 3000K/3500K/4000K selectable	OP - OPAL	WH - WHITE
	T - 2 x 90° T SHAPED	D2700 ⁴ - 2700K 90CRI		BK - BLACK
	X - 4 x 90° X SHAPED	D5000 ⁴ - 5000K 90CRI		SV - SILVER
	V ⁴ - 120° V SHAPED			
	Y - 3 x 120° Y SHAPED			

⁴ Consult factory on lead time

OPTIONAL REMOTE EMERGENCY BATTERY
EM-LIN [see Page 6 for details](#)

OPTIONAL ROLLABLE LENS
LIN-LC-OP - [see Page 6 for details](#)
1Ft increments up to 80Ft

MOUNTING ACCESSORIES
[See Page 3 for details](#)



NY 15 Harbor Park Drive
Port Washington, NY 11050

Main 800 527 7796
Fax 855 265 5768

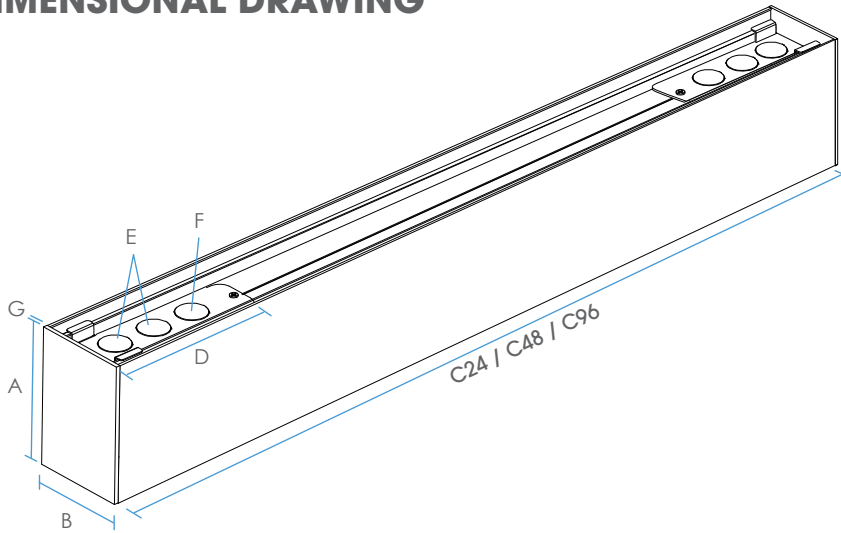
CA 219 South 6th Ave
City of Industry, CA 91746

Main 800 527 7796
Fax 855 265 5768

support@jescolighting.com
Tech Support 855 592 0029

Fixture Type	
Project	
Notes	

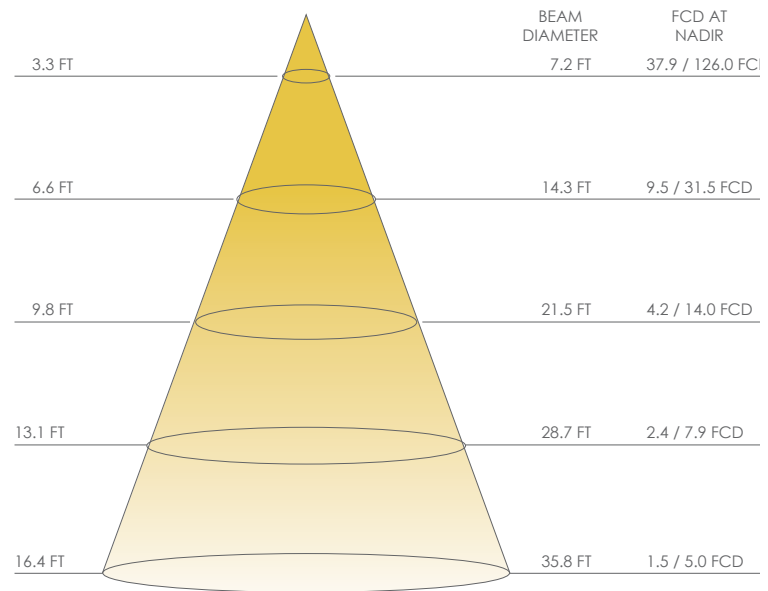
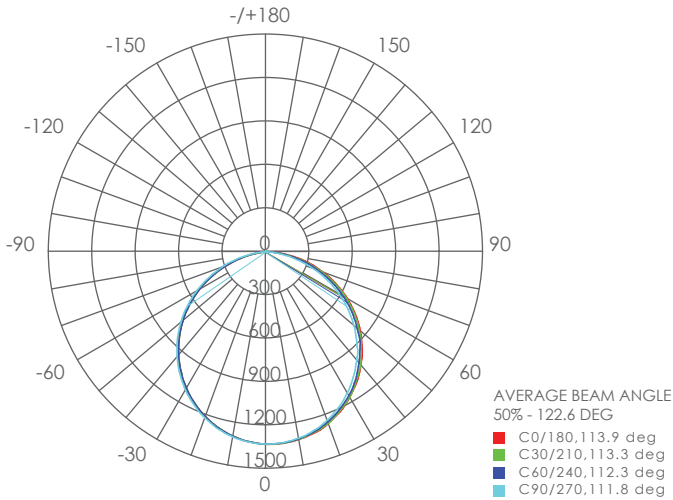
DIMENSIONAL DRAWING



DIMENSIONS

A	3 3/16"	88mm Height
B	2 1/2"	63mm Width
C24	24 3/16"	614mm
C48	47 1/4"	1200mm
C96	94 1/2"	2400mm
D	4 5/16"	110mm Knockout plate length
E	Trade size 3/8"	Knockout
F	Trade size 1/2"	Knockout
G	1/8"	3.7mm Thickness of endcap

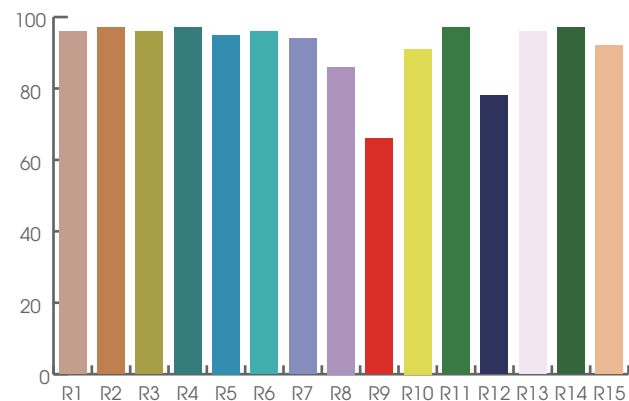
PHOTOMETRIC 3500K 48in. SAMPLE



TM30-15 3500K 48in. Sample

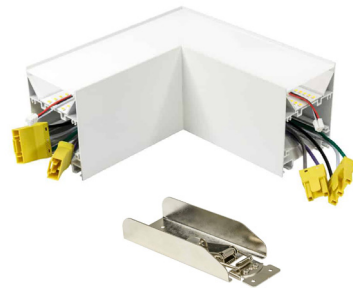
CRI (Re) (R1-R15) Ra = 94.7 AvgR = 91.6

R1	96	R6	96	R11	97
R2	97	R7	94	R12	78
R3	96	R8	86	R13	96
R4	97	R9	66	R14	97
R5	95	R10	91	R15	92

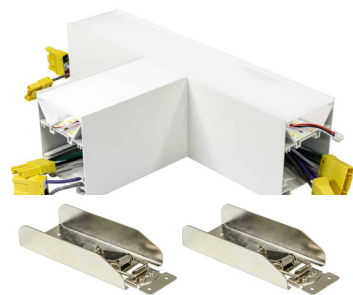
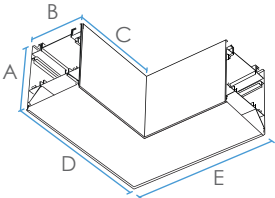


Fixture Type	
Project	
Notes	

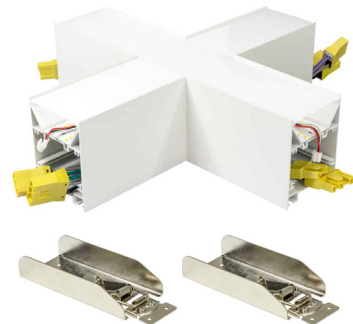
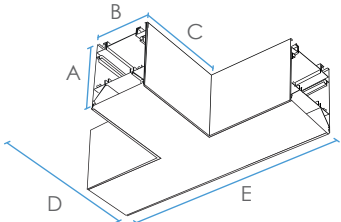
LIT CONNECTORS



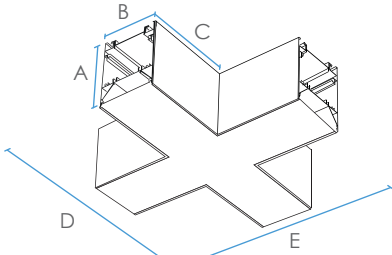
	SHAPE	CCT	LENS	FINISH	
PART NUMBER	LIN - D - L -	D50	OP		
DESCRIPTION	90° L Shaped Lit Connector				
LUMEN	660 Lm				
ENVIRONMENT	Indoor, Dry				
DIMENSIONS	A 3 3/16" (88 mm)	B 2 1/2" (63 mm)	C 4 7/16" (113 mm)	D 6 15/16" (176 mm)	E 6 15/16" (176 mm)
LIN-JBR 1 included					
Metal support bracket with latch & hook locking mechanism					



	SHAPE	CCT	LENS	FINISH	
PART NUMBER	LIN - D - T -	D50	OP		
DESCRIPTION	2 x 90° T Shaped Lit Connector				
LUMEN	1000 Lm				
ENVIRONMENT	Indoor, Dry				
DIMENSIONS	A 3 3/16" (88 mm)	B 2 1/2" (63 mm)	C 4 7/16" (113 mm)	D 6 15/16" (176 mm)	E 11 3/8" (289 mm)
LIN-JBR 2 included					
Metal support bracket with latch & hook locking mechanism					

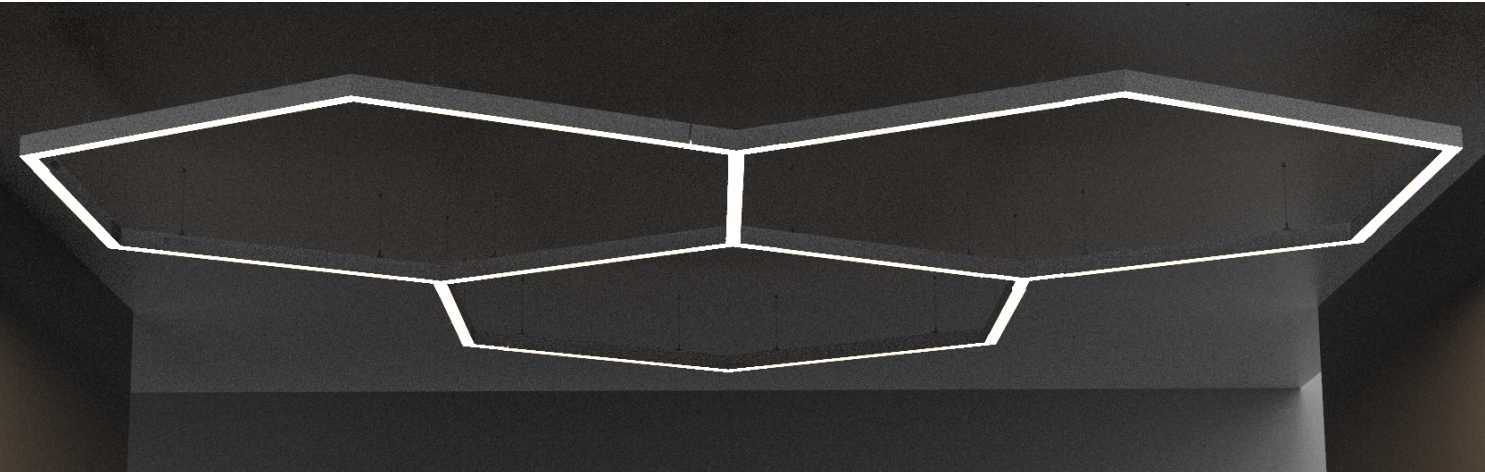


	SHAPE	CCT	LENS	FINISH	
PART NUMBER	LIN - D - X -	D50	OP		
DESCRIPTION	4 x 90° X Shaped Lit Connector				
LUMEN	1320 Lm				
ENVIRONMENT	Indoor, Dry				
DIMENSIONS	A 3 3/16" (88 mm)	B 2 1/2" (63 mm)	C 4 7/16" (113 mm)	D 11 3/8" (289 mm)	E 11 3/8" (289 mm)
LIN-JBR 2 included					
Metal support bracket with latch & hook locking mechanism					

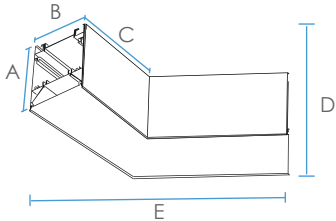


Fixture Type	
Project	
Notes	

LIT CONNECTORS ... continued



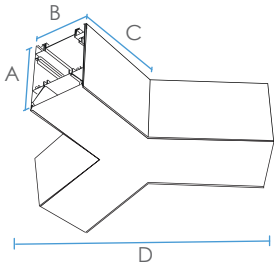
	SHAPE	CCT	LENS	FINISH
PART NUMBER	LIN - D - V -	D50	OP	
DESCRIPTION	120° V Shaped Lit Connector			
LUMEN	660 Lm			
ENVIRONMENT	Indoor, Dry			
DIMENSIONS	A 3 3/16" (88mm)	B 2 1/2" (63 mm)	C 4 7/16" (113 mm)	



LIN-JBR 1 included
Metal support bracket with latch & hook locking mechanism



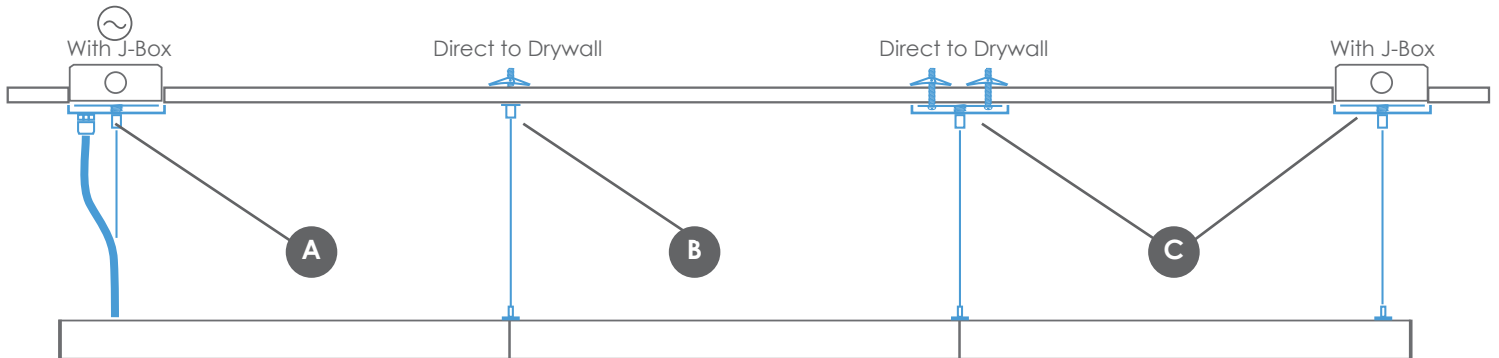
	SHAPE	CCT	LENS	FINISH
PART NUMBER	LIN - D - Y -	D50	OP	
DESCRIPTION	120° Y Shaped Lit Connector			
LUMEN	1000 Lm			
ENVIRONMENT	Indoor, Dry			
DIMENSIONS	A 3 3/16" (88 mm)	B 2 1/2" (63 mm)	C 4 7/16" (113 mm)	D 4 7/16" (113 mm)



LIN-JBR 2 included
Metal support bracket with latch & hook locking mechanism

Fixture Type	
Project	
Notes	

MOUNTING ACCESSORIES PENDANT MOUNT



A

LIN-PD-KIT-PF-WH-8FT

Pendant mounting kit with power feed canopy and mounting accessories. White canopy, cord 8Ft air-craft cable and cord. Indoor, Dry.

LIN-PD-KIT-PF-WH-20FT

Pendant mounting kit with power feed canopy and mounting accessories. White canopy, cord 20Ft air-craft cable and cord. Indoor, Dry.

LIN-PD-KIT-PF-BK-8FT

Pendant mounting kit with power feed canopy and mounting accessories. Black canopy, cord 8Ft air-craft cable and cord. Indoor, Dry.

LIN-PD-KIT-PF-BK-20FT

Pendant mounting kit with power feed canopy and mounting accessories. Black canopy, cord 20Ft air-craft cable and cord. Indoor, Dry.

B

LIN-PD-KIT-DC-8FT

Pendant direct mounting kit 8Ft air-craft cable Indoor, Dry.

LIN-PD-KIT-DC-20FT

Pendant direct mounting kit 20Ft air-craft cable Indoor, Dry.

C

LIN-PD-KIT-NF-WH-8FT

Pendant mounting kit with non-power canopy and mounting accessories. White canopy, cord 8Ft air-craft cable and cord. Indoor, Dry.

LIN-PD-KIT-NF-WH-20FT

Pendant mounting kit with non-power canopy and mounting accessories. White canopy, cord 20Ft air-craft cable and cord. Indoor, Dry.

LIN-PD-KIT-NF-BK-8FT

Pendant mounting kit with non-power canopy and mounting accessories. Black canopy, cord 8Ft air-craft cable and cord. Indoor, Dry.

LIN-PD-KIT-NF-BK-20FT

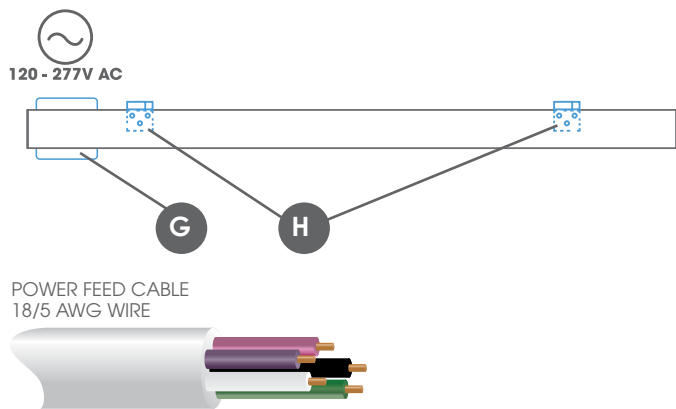
Pendant mounting kit with non-power canopy and mounting accessories. Black canopy, cord 20Ft air-craft cable and cord. Indoor, Dry.

POWER FEED CABLE
18/5 AWG WIRE



Fixture Type	
Project	
Notes	

MOUNTING ACCESSORIES WALL MOUNT



G

LIN-SM-KIT-PF-WH

Surface mount power-feed kit with 2Ft.
White cord, white cover plate. Indoor, Dry.

LIN-SM-KIT-PF-BK

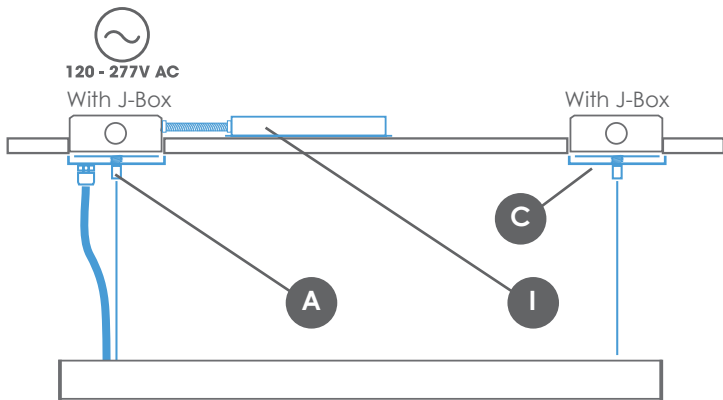
Surface mount power-feed kit with 2Ft.
Black cord, black cover plate. Indoor, Dry.

H

LIN-WS-KIT

Universal 9/16, 15/16. T-Bar recessed mounting kit. Indoor, Dry.

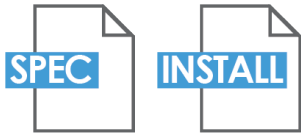
REMOTE EMERGENCY BATTERY



I

EM-LIN

Remote emergency battery back up with remote tester.



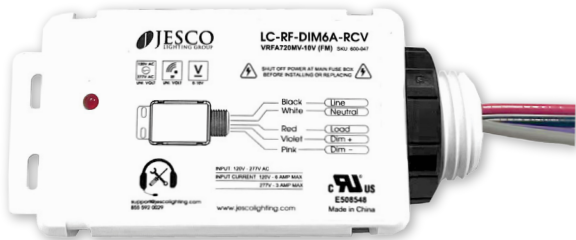
LIN-DI

LED LINEAR
DIRECT/INDIRECT LINEAR LIGHTING

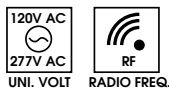
JESCO
LIGHTING GROUP

Fixture Type	
Project	
Notes	

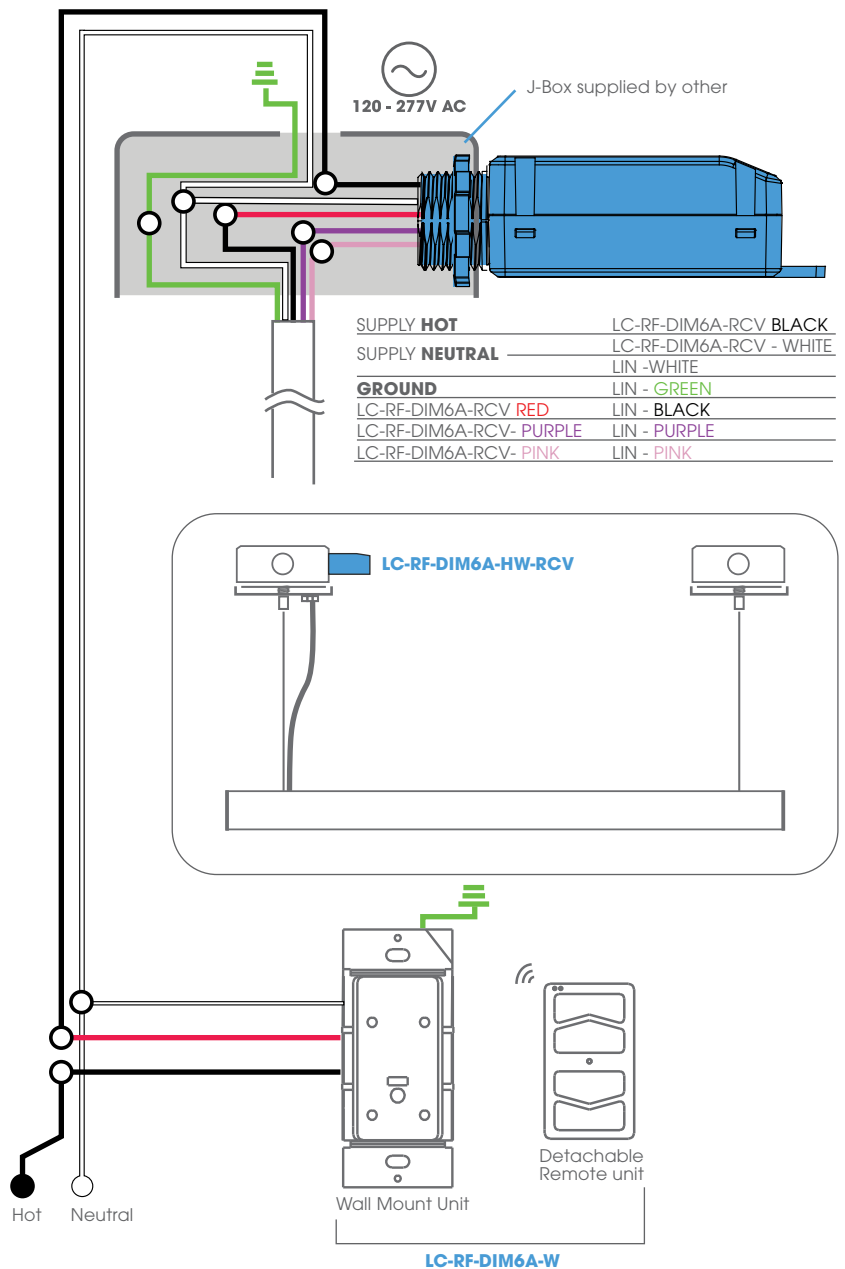
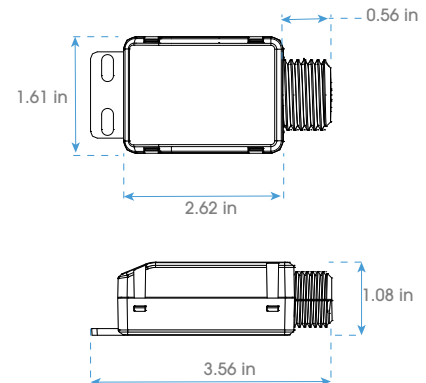
RF DIMMING



MODEL	LC-RF-DIM6A-HW-RCV
DESCRIPTIONS	0-10V RF Hardwire Receiver
INPUT VOLTAGE	120V - 277V AC
INPUT CURRENT MAX	120V - 6A / 277V - 3A
STAND BY POWER	<1W
OUTPUT POWER MAX	120V - 720W / 277V - 831W
LIN SERIES DIRECT	120V - 80FT / 277V - 100FT
LIN SERIES DIRECT/INDIRECT	120V - 60FT / 277V - 70FT
AMBIENT TEMPERATURE, t_a	-4F° - 113F°
STORAGE TEMPERATURE	-13F° - 131F°
MAX. RELATIVE HUMIDITY	0-75%, non condensing
ENVIRONMENT	Indoor, Dry IP20



MODEL	LC-RF-DIM6A-W
DESCRIPTIONS	0-10V RF Wall Dimming Switch
INPUT VOLTAGE	120V - 277V AC
INPUT CURRENT MAX	120V - 6A / 277V - 3A
CHARGING OUTPUT	5V DC, 60mA
OPERATING RANGE	25 Ft
ENVIRONMENT	Indoor, Dry IP20



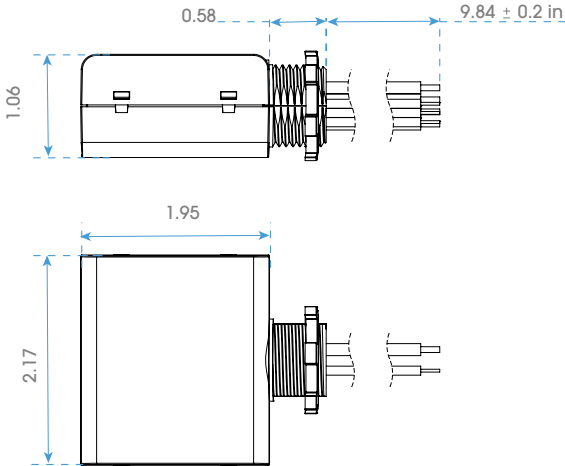
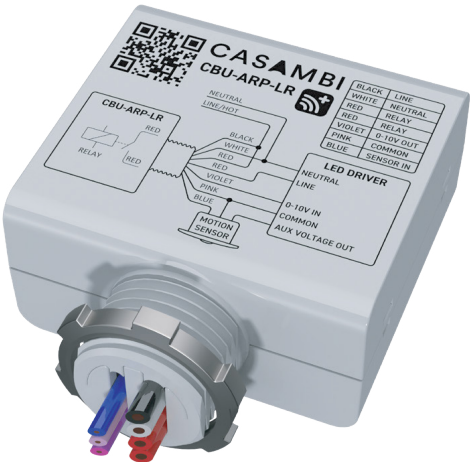
LIN-DI

LED LINEAR
DIRECT/INDIRECT LINEAR LIGHTING

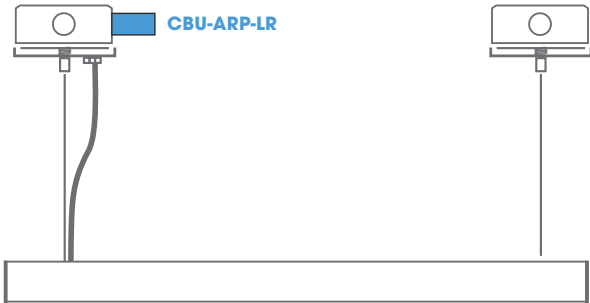
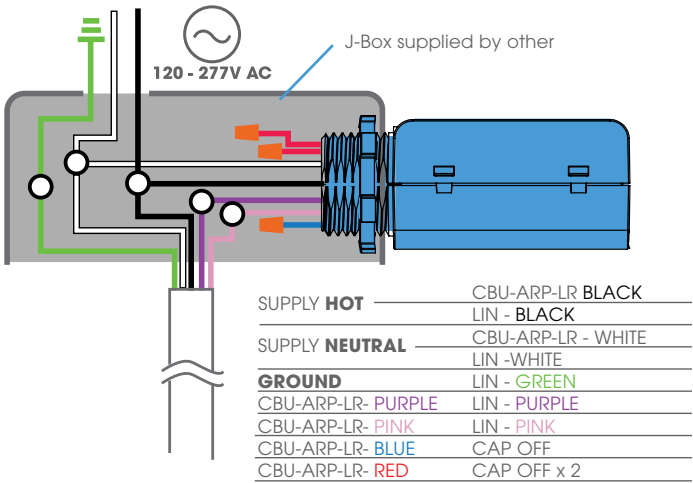
JESCO
LIGHTING GROUP

Fixture Type	
Project	
Notes	

CASAMBI READY



MODEL	CBU-ARP-LR supply by other
RATED POWER	120V 240W
	277V 554W
RATED CURRENT	2A
INPUT	120-277V AC
RELAY CONTACT RATING	120-277V AC
CONTROL OUTPUT	0-10V DC, max 7mA
OPERATING FREQUENCIES	2400-2480 MHz
MAX. OUTPUT POWER	+4dBm
NO-LOAD STANDBY POWER	< 0.5W
AMBIENT TEMPERATURE, <i>t</i> _a	-4F° - 113F°
MAX. CASE TEMPERATURE, <i>t</i> _c	158F°
STORAGE TEMPERATURE	-13F° - 158F°
MAX. RELATIVE HUMIDITY	0-80%, non condensing
ENVIRONMENT	Indoor, Dry IP20
WIRE GAUGE INPUT/OUTPUT	14-22AWG Solid or Stranded
WIRE STRIP LENGTH	0.2"
TIGHTENING FORECE	0.4Nm
MAX. INPUT CABLE LENGTH	10 Ft
MAX. LOAD CABLE LENGTH	10 Ft
WEIGHT	110 g



MAX CONNECTED RUN LENGTH	120V DIRECT - 80 Feet
	120V DIRECT/INDIRECT - 60 Feet
	277V DIRECT - 80 Feet
	277V DIRECT/INDIRECT - 60 Feet

JESCO Model LIN-DI-24-20W-DSW1-OP-BK
(Lutron LP-LIP02-CNTN20-0450 Constant Current LED Driver)

