

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

RETROLED COMPONENTS, LLC,
Plaintiff,

v.

PRINCIPAL LIGHTING GROUP, LLC
Defendant.

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Civil Case No. 6:18-cv-55-ADA

JURY TRIAL DEMANDED

EXHIBIT TO
RETROLED COMPONENTS, LLC'S
INITIAL DISCLOSURES OF
INVALIDITY

Exhibit *Huang* in view of *Socarras References*
in further view of *InfoSystems*

35 U.S.C. § 103 – Claims 4 & 5

<u>US9311835</u>	Patent US 9,311,835 Claim Chart – Breihof '835	Exhibit <i>Huang</i> in view of <i>Socarras References</i> in further view of <i>InfoSystems</i>		
Assignee:	SignComp, LLC	35 U.S.C. §103 – Claims 4 & 5		
Title:	Lighting mount for interior-lighted signage and method of retrofitting a lighted sign	<u>Huang</u>	<u>Socarras References</u>	<u>InfoSystems</u>
Filing Date:	2011-11-22	US Pub. No. 2009/0027916 A1	U.S. Provisional No.: 61/332,080	DE 299 00 320 U 1
Publication Date:	2016-04-12	Priority Date: 12/14/2005	Filed (Priority Date): 4/8/2010	Applicant: InfoSystems GmbH Visuelle
Inventor:	Breihof, Thomas C.	Filed: 7/22/2008	US Pub. No.: 2011/0249440 A1	Filing Date: 4/1/1999
Earliest Priority:	2010-11-24, US 61417156	Published: 1/29/2009	Filed: 4/7/2011	Published: 5/12/1999
Claims:				
1	Claim 1	See Narrative Contention A and its associated Exhibits.		
2	Claim 2	See Narrative Contention G and its associated Exhibits.		
4	The lamp support assembly of claim 2, wherein said inwardly-facing sides of said end caps comprise a plurality of projections for engaging said I-beam cross section of	Dependent claims 4 and 5 of the <i>Breihof</i> '835 patent are invalid as being obvious under 35 U.S.C. § 103 over <i>Huang</i> in view of the <i>Socarras</i> disclosures and		

Exhibit *Huang* in view of *Socarras* References in further view of *InfoSystems*

35 U.S.C. §103 – Claims 4 & 5

said elongate support member at said opposite ends thereof.

InfoSystems. Claim 4 is dependent on claim 2 which is dependent on claim 1. Claim 5 is dependent on claim 4. Contention G above and its exhibits shows that claim 2 is invalid as being obvious over *Huang* in view of the *Socarras* references. *InfoSystems* discloses a “replacement kit” illumination system in which a plurality of LEDs are disposed along an elongated circuit board held by an “illumination carrier” which in turn, along with the circuit board, is held by end pieces (i.e., “end caps”) made of insulating material to create a unit that is a replacement kit for fluorescent bulbs and which is plugged into existing fluorescent sockets for use in signs such as those found in public transit areas. In particular, *InfoSystems* teaches that, “[t]he end pieces 14 have a circular-cylindrical core 15 made from an insulating material, the lateral surface of which carries a metal jacket 16. In the core 14[sic] of the end pieces 14, a slot-shaped recess 17 of a low depth is respectively machined in the side facing the reflector 8. This recess extends respectively along the radius of which the contact pins 9, 10 (or the unused contacts 9’, 10’) are arranged. The recess 8.1 accommodates the edges on the narrow side

Exhibit Huang in view of Socarras References in further view of InfoSystems

35 U.S.C. §103 – Claims 4 & 5

of the circuit board 7 and secures in this way their stable position within the space volume surrounded by reflector 8.” (page 10, 1st para, *InfoSystems*). Consequently, the recited limitation of claim 4 of *Breihof* ’835 in which the end caps “comprise a plurality of projections for engaging said I-beam cross section of said elongate support member” would have been, prior to the invention date of *Breihof* ’835, made obvious to the person of ordinary skill in the art by the reference in *InfoSystems* of engaging the end caps with the elongate support member for the LEDs (which in *InfoSystems* is a circuit board) because once an I-beam was considered for the elongate support structure as disclosed in the *Socarras References*, the configuration of projections to mate with that particular design of elongate support member would have been obvious as it is merely a design choice as to the particular stability enhancing mode of engagement between the end cap and the corresponding configuration of the elongate support member which in claim 4 is an I-beam as taught by the *Socarras* references as further explained above in, for example, contention G and any related exhibits. A person of ordinary skill in the art at the

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5	<p>The lamp support assembly of claim 4, wherein said inwardly-facing sides of said end caps are configured to engage either of (i) a single-web I-beam cross section or (ii) a dual-web I-beam cross section of said elongate support member.</p>	<p>time of the purported <i>Breihof</i>’835 inventions would, therefore, have been motivated to combine the teachings of <i>Huang</i> with <i>Socarras</i> and <i>InfoSystems</i> which are directed to fluorescent to LED replacements and systems thus rendering, as a whole, the purported invention of claim 4 of the <i>Breihof</i>’835 patent obvious. Further, as to claim 5, the particular cross section of I-beam recited in claim 5 as either having “a <i>single-web</i>” or “<i>dual-web</i>” would have been obvious to a person of ordinary skill in the art through that practitioner’s knowledge of the <i>Socarras</i> references which disclose an I-beam elongate support member and various iterations of the I-beam configuration are merely a design choice available to the person of ordinary skill in the art. Thus, both claims 4 and 5 of the <i>Breihof</i>’835 patent are invalid as being obvious under 35 U.S.C. § 103 over <i>Huang</i> in view of the <i>Socarras</i> disclosures and <i>InfoSystems</i>.</p>
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