

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 *InfoSystems* in view of *Huang* and/or  
*Withers* and/or *Royal Lighting* and in view of  
*Socarras References*

35 U.S.C. § 103 – Claims 4 & 5

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|---------------------------|---|--|---|--|---|---|
| <b><u>US9311835</u></b>   | <b>Patent US 9,311,835 Claim Chart – Breihof '835</b>                                 | <b>Exhibit <i>InfoSystems</i> in view of <i>Huang</i> and/or <i>Withers</i> and/or <i>Royal Lighting</i> and in view of <i>Socarras References</i></b>                             |   |  |   |   |
| <b>Assignee:</b>          | SignComp, LLC   | <b><u>35 U.S.C. §103 – Claims 4 &amp; 5</u></b>  |   |  |   |   |
| <b>Title:</b>             | Lighting mount for interior-lighted signage and method of retrofitting a lighted sign | <b><u>InfoSystems</u></b><br><b>DE 299 00 320 U 1</b><br><b>Applicant:</b><br><b>InforSystems GmbH Visuelle</b><br><b>Filed: 4/1/1999</b><br><b>Published:</b><br><b>5/12/1999</b> | <b><u>Huang</u></b><br><b>US Pub. No.</b><br><b>2009/0027916 A1</b><br><b>Priority Date:</b><br><b>12/14/2005</b><br><b>Filed: 7/22/2008</b><br><b>Published:</b><br><b>1/29/2009</b> | <b><u>Withers</u></b><br><b>US Patent No.</b><br><b>8,419,223</b><br><b>Priority Date:</b><br><b>4/23/2009</b><br><b>Issued:</b><br><b>4/16/2013</b> | <b><u>Royal Lighting</u></b><br><b>Japanese Publication No.</b><br><b>2010-123097</b><br><b>Applicant: Royal Lighting Co. Ltd</b><br><b>Priority Date:</b><br><b>11/17/2008</b><br><b>Published:</b><br><b>6/3/2010</b> | <b><u>Socarras References</u></b><br><b>U.S. Provisional No.: 61/332,080 Filed (Priority Date): 4/8/2010</b><br><b>US Pub. No. 2011/0249440 A1 Filed: 4/7/2011</b><br><b>US Patent No. 8,926,129 Issued: 1/6/2015</b> |
| <b>Filing Date:</b>       | 2011-11-22  |  |   |  |   |   |
| <b>Publication Date:</b>  | 2016-04-12  |  |   |  |   |   |
| <b>Inventor:</b>          | Breihof, Thomas C.  |  |   |  |   |   |
| <b>Earliest Priority:</b> | 2010-11-24, US 61417156   |  |   |  |   |   |

**Claims:**

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| 1 | Claim 1   | See Narrative Contention E and its Exhibits, if any.   |
| 2 | Claim 2   | See Narrative Contention J and Exhibits, if any.   |
| 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 said elongate support member at said opposite ends thereof. | Dependent claims 4 and 5 of the Breihof '835 patent are invalid as being obvious under 35 U.S.C. § 103 over <i>InfoSystems</i> in view of <i>Huang</i> and/or <i>Withers</i> and/or <i>Royal Lighting</i> further in view of the <i>Socarras References</i> . Claim 5 is dependent |

**Exhibit *InfoSystems* in view of *Huang* and/or *Withers* and/or  
*Royal Lighting* and in view of *Socarras References***

**35 U.S.C. §103 – Claims 4 & 5**

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| <p>on claim 4 which is dependent on claim 2 which is dependent on claim 1. Narrative Contention E above and its exhibits shows that claim 1 is invalid as being obvious over <i>InfoSystems</i> in view of <i>Huang</i> and/or <i>Withers</i> and/or <i>Royal Lighting</i>. Narrative Contention J and its exhibits shows that claim 2 is obvious over <i>InfoSystems</i> in view of <i>Huang</i> and/or <i>Withers</i> and/or <i>Royal Lighting</i> and further in view of the <i>Socarras References</i>. Claim 4 of <i>Breihof</i> '835 adds to claim 2 the limitation “<i>wherein said inwardly-facing sides of said end caps comprise a plurality of projections for engaging said I-beam cross section of said elongate support member at said opposite ends thereof.</i>” <i>InfoSystems</i> discloses a “<i>replacement kit</i>” illumination system in which a plurality of LEDs are disposed along an elongated circuit board held by an “<i>illumination carrier</i>” which in turn, along with the circuit board, is held by end pieces (<i>i.e.</i>, “<i>end caps</i>”) 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</p> |
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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 of the circuit board 7 and secures in this way their stable position within the space volume surrounded by reflector 8.” (page 10, 1<sup>st</sup> para, *InfoSystems*).

Consequently, the recited feature of claim 4 of *Breihof*’835 in which the end caps comprise a plurality of projections for engaging the edge of the elongate support member which in claim 4 is in the shape of an I-beam cross section would have been prior to the invention date of *Breihof*’835, obvious to the person of ordinary skill in the art by the reference in *InfoSystems* of engaging the end caps with the

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| 5 |  | <p>elongate support member for the LEDs (which in <i>InfoSystems</i> is a circuit board) because once an I-beam was considered for the elongate support structure as disclosed in the <i>Socarras References</i>, 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 enhancing mode of engagement between the end cap and the corresponding configuration of the elongate support member as an I-beam as taught by the <i>Socarras References</i> and recited by claim 4. A person of ordinary skill in the art at the time of the purported <i>Breihof</i> '835 inventions would have been therefore motivated to combine the teachings of <i>InfoSystems</i> in view of <i>Huang</i> and/or <i>Withers</i> and/or <i>Royal Lighting</i> further in view of the <i>Socarras References</i> which are directed to fluorescent to LED replacements and systems and, therefore, such a person would have been motivated to combine various elements and structures from those references thus rendering, as a whole, the claimed invention of claim 4 of the <i>Breihof</i> '835 patent</p> |
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**35 U.S.C. §103 – Claims 4 & 5**

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| <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>obvious. Further, as to claim 5, the particular cross section of I-beam recited in claim 5 as either having “<i>a 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 References</i> which disclose an I-beam elongate support member and various iterations of the basic 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 Breihof ’835 patent are invalid as being obvious under 35 U.S.C. § 103 over <i>InfoSystems</i> in view of <i>Huang</i> and/or <i>Withers</i> and/or <i>Royal Lighting</i> further in view of the <i>Socarras References</i>.</p> |
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