

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 the
Socarras References

35 U.S.C. § 103 – Claim 6

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|---------------------------|---|---|---|
| <u>US9311835</u> | Patent US 9,311,835 Claim Chart – Breihof ’835 patent | Exhibit <i>Huang</i> in view of the <i>Socarras References</i> <u>35 U.S.C. §103 – Claim 6</u> | |
| Assignee: | SignComp, LLC | | |
| Title: | Lighting mount for interior-lighted signage and method of retrofitting a lighted sign | <u>Huang</u> | <u>Socarras References</u> |
| Filing Date: | 2011-11-22 | US Pub. No. 2009/0027916 A1 | U.S. Provisional No.: 61/332,080 |
| Publication Date: | 2016-04-12 | Priority Date: 12/14/2005 | Filed (Priority Date): 4/8/2010 |
| Inventor: | Breihof, Thomas C. | Filed: 7/22/2008 | US Pub. No. 2011/0249440 A1 |
| Earliest Priority: | US 61417156 2010-11-24 | Published: 1/29/2009 | Filed: 4/7/2011 US Patent No. 8,926,129 Issued: 1/6/2015 |

Claims:

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| <i>1</i> | Claim 1 | See Narrative Contention A and its Exhibits. |
| <i>2</i> | The lamp support assembly of claim 1, wherein said elongate support member comprises an I-beam cross section having a web portion and spaced-apart flange portions on opposite ends of said web portion. | See Narrative Contention G and its Exhibits. |
| <i>6</i> | The lamp support assembly of claim 2, wherein said elongate support member is configured to support the plurality of electric lamp units at said web portion. | Dependent claim 6 of the <i>Breihof</i> ’835 patent is invalid as being obvious under 35 U.S.C. § 103 over <i>Huang</i> in view of the <i>Socarras References</i> . Claim 6 is dependent |

Exhibit *Huang* in view of the *Socarras References*

35 U.S.C. §103 – Claim 6

on claim 2. Narrative Contention G and its Exhibits demonstrates how claim 2 is obvious under 35 U.S.C. § 103 over *Huang* in view of the *Socarras References*. Claim 6 merely adds to claim 2 the limitation “*wherein said elongate support member is configured to support the plurality of electric lamp units at said web portion.*” The *Socarras References* disclose the limitations of claim 6, “[t]he ‘I-beam’ shaped cross-section delimits a channel 13 along the length of divider 3 such that it is adapted to receive a light strip 5 thereto.” ([0020] and Figs. 1 & 2 of *Socarras Provisional*). “*In some embodiments, the divider has an I-beam shaped cross-section, defining a channel along each side of the divider, wherein the LED strips may be disposed in the channels.*” (Col. 1, ll. 54-58, *Socarras Patent*). Consequently, a person of ordinary skill at the time of the invention of *Briehof*’835, being aware of the disclosures of *Huang* and the *Socarras References* would be motivated to combine the teachings and disclosures of these references given their common application to the problems of replacing fluorescents with LEDs, thus therefore rendering claim 6 obvious.