

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 *Nelson*

35 U.S.C. § 103 – Claim 8

<b><u>US9311835</u></b>	<b>Patent US 9,311,835 Claim Chart – <i>Breihof</i> ’835</b>
<b>Assignee:</b>	SignComp, LLC
<b>Title:</b>	Lighting mount for interior-lighted signage and method of retrofitting a lighted sign
<b>Filing Date:</b>	2011-11-22
<b>Publication Date:</b>	2016-04-12
<b>Inventor:</b>	Breihof, Thomas C.
<b>Earliest Priority:</b>	US 61417156 2010-11-24

**Exhibit *Huang* in view of *Nelson*  
35 U.S.C. §103 – Claim 8**

<b><u>Huang</u></b>	<b><u>Nelson</u></b>
<b>US Pub. No. 2009/0027916 A1</b>	<b>US Patent No 4,229,780</b>
<b>Priority Date: 12/14/2005</b>	<b>Issued: 10/21/1980</b>
<b>Filed: 7/22/2008</b>	
<b>Published: 1/29/2009</b>	

**Claims:**

<i>1</i>	Claim 1	See Narrative Contention A and its Exhibits.
<i>8</i>	The lamp support assembly of claim 1, wherein said mechanical coupling elements are configured to engage a fixed-position mount and a spring-loaded mount, each of the mounts being configured for supporting a respective opposite end portion or coupler of a gas-discharge lamp and for supplying electricity to the gas-discharge lamp.	Dependent claim 8 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 US Pat. No. 4,229,780, issued October 21, 1980 to Nelson (“ <i>Nelson</i> ”). The anticipation of the purported invention of claim 1 by <i>Huang</i> is demonstrated above in Narrative Contention A and its exhibits. <i>Nelson</i> discloses a fluorescent lighting assembly for use in explosive atmospheres such as mines. In describing the disclosed lighting assembly, <i>Nelson</i> discloses that, “[a]

**Exhibit Huang in view of Nelson**  
**35 U.S.C. §103 – Claim 8**

*standard stationary socket 36 is mounted by screws 38, 38 on the end portion 34 of the head end of the lamp, and a standard spring-loaded socket 40 is mounted by screws 42 on the end portion 34 at the tail end of the lamp.” (Nelson, Col. 3, l. 67 – Col. 4, l. 3.)* In devising systems to replace fluorescent bulbs with LED based systems, a person of ordinary skill in the art would have been aware of various sockets and mounts by which fluorescents are mounted and the use of a standard spring loaded socket or mounts situated to accept one end of an applied fluorescent bulb and a standard stationary socket or mount disposed to accept the other end of the fluorescent bulbs to be replaced would be within the field of art of the POSA seeking to replace fluorescents with LEDs while using much of the fluorescent infrastructure. *Nelson* discloses such a pair of mounts as recited in claim 8 and tellingly identifies them as “*standard.*” Thus, a person of ordinary skill in the art at the time of the purported *Breihof*’835 claim 8 invention would have been motivated to combine the teachings of

**Exhibit *Huang* in view of *Nelson***  
**35 U.S.C. §103 – Claim 8**

		<p><i>Huang</i> and <i>Nelson</i> in devising a system in which standard spring and stationary fluorescent mount pairs were used with systems to replace fluorescent bulbs with LEDs thus rendering the purported invention of claim 8, as a whole, obvious under 35 U.S.C. § 103 over <i>Huang</i> in view of <i>Nelson</i>.</p>
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