

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 *Fritts*

35 U.S.C. § 103 – Claim 8

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

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

Huang
US Pub. No.
2009/0027916 A1
Priority Date: 12/14/2005
Filed: 7/22/2008
Published: 1/29/2009

Fritts
US Patent No 5,282,117
Issued: 1/25/1994

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 U.S. Pat. No. 5,282,117, issued January 25, 1994 to <i>Fritts</i> (“ <i>Fritts</i> ”). The anticipation of the purported invention of claim 1 by <i>Huang</i> is demonstrated in Narrative Contention A and its Exhibits. <i>Fritts</i> is concerned with “internally illuminated displays of the type” that “commonly utilize a light box incorporating therein an array of equally spaced parallel rectilinear

Exhibit *Huang* in view of *Fritts*

35 U.S.C. §103 – Claim 8

fluorescent lamps behind a diffusely light transmissive white display panel adapted to bear a light transmissive image to be illuminated.” (Fritts, Col. 1, ll. 23 – 29.) *Fritts* discloses a system to provide more even illumination from such “light boxes” (i.e., signs). In disclosing the inventive system, *Fritts* describes the receptacles used in conjunction with the disclosed light box. “*Mounted on a spacer plate 25 suitably fixed to and overlying the bottom wall 15 adjacent the rear wall 17 is a static receptacle 26 for each of the lamps 24 and into which the respective lower ends of said lamps are received. Running along and secured to the inner surface of the upper wall 14 adjacent the rear wall 17 is a receptacle mounting member 27 which is apertured to receive a spring loaded upper receptacle 28 for each of the lamps 24.*” *Fritts*, Col 5, ll. 10-19. In devising systems to replace fluorescent bulbs with LED based systems, a person of ordinary skill in the art at the time of the invention would have been aware of various sockets and

Exhibit *Huang* in view of *Fritts*

35 U.S.C. §103 – Claim 8

		<p>mount 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 with a standard stationary socket or mount disposed to accept the other end of the fluorescent bulbs to be replaced. This would be within the field of art of the practitioner seeking to replace fluorescents with LEDs while using much of the fluorescent infrastructure. Thus, a person of ordinary skill in the art at the time of the purported <i>Breihof</i> '835 claim 8 invention would have been motivated to combine the teachings of <i>Huang</i> and <i>Fritts</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>Fritts</i>.</p>
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