

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 Cross

35 U.S.C. § 103 – Claim 12

<u>US9311835</u>	Patent US 9,311,835 Claim Chart – <i>Breihof</i> '835	Exhibit <i>Huang</i> in view of <i>Cross</i> <u>35 U.S.C. §103 – Claim 12</u>	
Assignee:	SignComp, LLC		
Title:	Lighting mount for interior-lighted signage and method of retrofitting a lighted sign	<u><i>Huang</i></u>	<u><i>Cross</i></u>
Filing Date:	2011-11-22	US Pub. No. 2009/0027916 A1	U.S. Pub. No.: 2004/0062041
Publication Date:	2016-04-12	Priority Date: 12/14/2005	Filed: 9/25/2003
Inventor:	Breihof, Thomas C.	Filed: 7/22/2008	Published: 4/1/2004
Earliest Priority:	US 61417156 2010-11-24	Published: 1/29/2009	

Claims:

<i>1</i>	Claim 1	See Narrative Contention A and its Exhibits.
<i>12</i>	The lamp support assembly of claim 1, wherein said elongate support member comprises a metal or a resinous plastic extrusion, and wherein said end caps comprise a non-metal material.	Dependent claim 12 is invalid as being obvious under 35 U.S.C. § 103 over <i>Huang</i> in view of U.S. Pat. App. Pub. No. 2004/0062041 filed September 25, 2003 and published April 1, 2004 to <i>Cross</i> , et al. (“ <i>Cross</i> ”) which recites that an end cap “ <i>is preferably fabricated from non-conductive materials....</i> [para 0024, <i>Cross</i>] All metals are conductive. Therefore, as <i>Cross</i> teaches an end cap is preferably non-conductive, it must be non-metal. Consequently, the recited limitation of Claim 12,

Exhibit *Huang* in view of *Cross*

35 U.S.C. §103 – Claim 12

that the end caps “*comprise a non-metal*” is provided by the teachings of *Cross*. Circuit boards comprise metal for electrical conduction purposes and therefore, use of a circuit board as the elongate support member inherently also discloses a system in which the “*elongate support member comprises a metal or resinous plastic extrusion*” as recited by claim 12 of *Briehof* ’835. Consequently, both limitations added by claim 12 are available in the prior art of which the person of ordinary skill is deemed to have knowledge and, therefore, such a person in working to devise systems to replace fluorescent bulbs with lower power lighting assemblies would be motivated to combine the teachings of *Huang* and *Cross* thus rendering the purported invention of claim 12 obvious in light of those references.