

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 *InfoSystems*

35 U.S.C. § 103 – Claim 12

<u>US9311835</u>	Patent US 9,311,835 Claim Chart – <i>Breihof '835</i>	Exhibit <i>Huang</i> in view of <i>InfoSystems</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>Huang</u> US Pub. No. 2009/0027916 A1 Priority Date: 12/14/2005 Filed: 7/22/2008 Published: 1/29/2009	<u>InfoSystems</u> DE 299 00 320 U 1 Applicant: InfoSystems GmbH Visuelle Filing Date: 4/1/1999 Published: 5/12/1999
Filing Date:	2011-11-22		
Publication Date:	2016-04-12		
Inventor:	Breihof, Thomas C.		
Earliest Priority:	US 61417156 2010-11-24		

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 <i>InfoSystems</i> . Claim 12 depends from claim 1. The anticipation of claim 1 by <i>Huang</i> is shown as stated above and in Narrative Contention A and its Exhibits. In the retro-fit kit of <i>InfoSystems</i> devised for replacement of fluorescent tubes with low voltage based lamps, <i>InfoSystems</i> discloses that the “end pieces” (i.e., the end caps) are “made from an insulating material...” <i>InfoSystems</i> 2 nd

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para, page 7. Therefore the recited limitation of claim 12 in which the end caps “comprise” a non-metal is disclosed by *InfoSystems*. As previously demonstrated, *Huang* employs a circuit board as the elongate support member. 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. As added support for, *Shimamoto* discloses various modes of thru-hole technologies in circuit boards and in so doing, introduces the basic technology of circuit boards as follows and thereby shows that the circuit board of *Huang* which is the elongate support member recited in claims 1 and 12 of *Breihof* ’835 inherently discloses a metal or resinous plastic extrusion. *Shimamoto* states, “[r]eferring to FIG. 1, a circuit board generally designated at 2 includes a board body 4 constituted by an insulating substrate 6. The insulating

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substrate 6 may be in any form such as paper based-phenolic resin laminated substrate, paper base-epoxy resin laminated substrate, paper base-polyester resin laminated substrate, glass base-epoxy resin laminated substrate, paper base-teflon resin laminated substrate, glass base-polyimide resin laminated substrate, glass base-BT (bismleimide-triazine) resin laminated substrate, or a synthetic resin substrate such as composite resin board, or a flexible substrate such as of polyimide resin or polyester resin, or a metallic insulating substrate of aluminum, steel, stainless steel and the loke coated with an epoxy resin to have electrically insulating property or a ceramic substrate.” (Col. 4, 1. 59 – Col. 5, 1. 5. *Shimamoto*). Thus, *Shimamoto* demonstrates that a circuit board, which is used in *Huang* and the elongate support member for the electric lamps, comprises a metal or resinous plastic extrusion. A person of ordinary skill in the art, being deemed to know the contents of *Huang* and *InfoSystems* would be motivated to combine the teachings of those

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		<p>references in devising a system that replaces fluorescent bulbs with lower powered lamps such as LEDs thus rendering, as a whole, the purported invention of claim 12 obvious.</p>
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