

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 *Peddinghaus*

35 U.S.C. § 103 - Claim 14

<u>US9311835</u>	Patent US 9,311,835 Claim Chart – Breihof '835	Exhibit <i>Huang</i> in view of <i>Peddinghaus</i> 35 U.S.C. §103 - Claim 14	
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>Peddinghaus</u> US Patent No. 4,691,601 Issued: September 8, 1987
Filing Date:	2011-11-22		
Publication Date:	2016-04-12		
Inventor:	Breihof, Thomas C.		
Earliest Priority:	US 61417156 2010-11-24		

Claims:

14	<p>The method of claim 13, further comprising cutting the elongate support member to fit between the one or more respective pairs of the gas-discharge lamp couplings or the replacement couplings.</p>	<p style="text-align: center;">FIG. 1</p>	<p>See Narrative Contention A and its Exhibits as to Claim 13.</p> <p>Dependent claim 14 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. Patent No. 4,691,601 entitled, “Method of Sawing a Steel Structural Shape Having at least One Flange” issued September 8, 1987 to Peddinghaus (“<i>Peddinghaus</i>”). Claim 14 is dependent on Claim 13. Claim 13</p>
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Exhibit *Huang* in view of *Peddinghaus*

35 U.S.C. §103 - Claim 14

is shown to be anticipated by *Huang* in Narrative Contention A and its Exhibits.

In considering the issue of fitting the elongate member in the space available between the pairs of “*gas discharge lamp couplings*” the process of “cutting the elongate support member” as required by claim 14 to so fit in the available space between the lamp couplings would have been a gating step. *Peddinghaus* discloses a method of cutting an I-beam. “*The structural steel shapes can have H,U,I, or T cross section or an angular profile, i.e. a channel I-beam, H-beam, T-beam or angle iron.*” (Col. 3, ll. 31-34 of *Peddinghaus*). The *Peddinghaus* method would have been known to the practitioner in the art and, in particular, the method prescribed by *Peddinghaus* would have been one available method for such cutting of an elongate support member such as an I-beam. Thus, the purported invention of claim 14 would have been obvious, as a whole, to a person of ordinary skill in the art seeking to cut the elongate support to fit between the one or more respective pairs of the “*gas discharge lamp couplings.*”