

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 *Royal Lighting* in view of  
*Huang* and in view of *Peddinghaus*

35 U.S.C. § 103 - Claim 14

<b><u>US9311835</u></b>	<b>Patent US 9,311,835 Claim Chart – Breihof ’835 patent</b>	<b>Exhibit <i>Royal Lighting</i> in view of <i>Huang</i> and <i>InfoSystems</i> in view of <i>Peddinghaus</i></b>			
<b>Assignee:</b>	SignComp, LLC	<b>35 U.S.C. §103 - Claim 14</b>			
<b>Title:</b>	Lighting mount for interior-lighted signage and method of retrofitting a lighted sign	<b><u>Royal Lighting</u></b>	<b><u>Huang</u></b>	<b><u>InfoSystems</u></b>	<b><u>Peddinghaus</u></b>
<b>Filing Date:</b>	2011-11-22	<b>Japanese Publication No. 2010-123097</b>	<b>US Pub. No. 2009/0027916</b>	<b>DE 299 00 320 U 1</b>	<b>US Patent No. 4,691,601</b>
<b>Publication Date:</b>	2016-04-12	<b>Applicant: Royal Lighting Co. Ltd</b>	<b>Priority Date: 12/14/2005</b>	<b>Applicant: InfoSystems GmbH Visuelle</b>	<b>Issued: 9/8/1987</b>
<b>Inventor:</b>	Breihof, Thomas C.	<b>Priority Date: 11/17/2008</b>	<b>Filed: 7/22/2008</b>	<b>Filing Date: 4/1/1999</b>	
<b>Earliest Priority:</b>	2010-11-24, US 61417156	<b>Published: 6/3/2010</b>	<b>Published: 1/29/2009</b>	<b>Published: 5/12/1999</b>	

**Claims:**

<i>13</i>	Claim 13	See Narrative Contention C and any associated exhibits. Also see Narrative Contention D and any associated claim charts.
<i>14</i>	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.	Dependent claim 14 of the <i>Breihof</i> ’835 patent is invalid as being obvious under 35 USC § 103 over <i>Royal Lighting</i> in view of <i>Huang</i> and US Pat. No. 4,691,601 entitled “Method of Sawing a Steel Structural Shape Having at least One Flange”

**Exhibit *Royal Lighting* in view of *Huang* and *InfoSystems* in view of *Peddinghaus***

**35 U.S.C. §103 - Claim 14**

issued September 8, 1987 to Peddinghaus (“*Peddinghaus*”). Claim 14 depends from claim 13 and prior Narrative Contentions C & D and any Exhibits set out the demonstration of the obviousness of claim 13 in light of *Royal Lighting* in view of *Huang*. As to claim 14, “[t]he 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*). In considering the claim 14 limitation “*further comprising cutting the elongate support member to fit*” in the space between the pairs of “*gas discharge couplings*” the process of cutting the elongate support member to so fit in the available space between the lamp couplings would have been a gating step. It is obvious that the replacement lamp must fit in the space available between the fluorescent mounts. Thus it follows that the elongate support member must be cut to fit the space available. *Peddinghaus* discloses a method of cutting an I-beam. An elongate support member having the configuration of an I-beam is disclosed and discussed in substantial detail in *Breihof* ’835. It would have been known to the person of

**Exhibit *Royal Lighting* in view of *Huang* and *InfoSystems* in view of *Peddinghaus***

**35 U.S.C. §103 - Claim 14**

		<p>ordinary skill in the art that the elongate support member supporting the lamps would need to fit between the gas discharge lamp couplings in a system in which fluorescents were to be replaced by and/or LED lamps if the system were to be convenient in application and achieve its goal. As to the cross-sectional shape of the elongate support member as disclosed in <i>Breihof</i>'835, the method prescribed by <i>Peddinghaus</i> would have been one available method for such cutting of an elongate support member to fit between the fluorescent lamp couplings. Consequently, a person of ordinary skill in the art, knowing the teachings of <i>Royal Lighting</i>, <i>Huang</i> and <i>Peddinghaus</i> would have been motivated to combine those teachings in cutting an elongate support member to fit in the available space between two fluorescent mounts thereby rendering as a whole, the purported invention of claim 14 obvious.</p>
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