

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 *Socarras References*
and further 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>Socarras References</i> and further in view of <i>Peddinghaus</i>		
Assignee:	SignComp, LLC	<u>35 U.S.C. § 103 – Claim 14</u>		
Title:	Lighting mount for interior-lighted signage and method of retrofitting a lighted sign	<u>Huang</u>	<u>Socarras References</u>	<u>Peddinghaus</u>
Filing Date:	2011-11-22	US Pub. No. 2009/0027916 A1	U.S. Provisional No.: 61/332,080	US Patent No. 4,691,601
Publication Date:	2016-04-12	Priority Date: 12/14/2005	Filed (Priority Date): 4/8/2010	Issued: 9/8/1987
Inventor:	Breihof, Thomas C.	Filed: 7/22/2008	US Pub. No. 2011/0249440 A1	
Earliest Priority:	2010-11-24, US 61417156	Published: 1/29/2009	Filed: 4/7/2011	
			US Patent No. 8,926,129	
			Issued: 1/6/2015	

Claims:

<i>13</i>	Claim 13	See Narrative Contentions A and G and their respective Exhibits.
<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 '835</i> patent is invalid as being obvious under 35 U.S.C. § 103 over <i>Huang</i> in view of the <i>Socarras</i> references and further in view of <i>Peddinghaus</i> . Claim 14 is dependent upon claim 13. Narrative Contention A and its exhibits demonstrates that claim 13 is

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35 U.S.C. § 103 – Claim 14

		<p>anticipated by <i>Huang</i>. In considering the claim 14 limitation “<i>further comprising cutting the elongate support member to fit</i>” in the space between the pairs of “<i>gas discharge couplings</i>” 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. <i>Peddinghaus</i> 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 <i>Breihof</i> ’835. The <i>Socarras References</i> disclose the use of elongate support members having a cross-sectional profile of an “<i>I-beam</i>” as recited in claim 14 and as demonstrated in Narrative Contention G and its Exhibits. In using such a structure as disclosed by the <i>Socarras References</i>, the person of ordinary skill in the art would be motivated to determine a method of cutting such a structure so as to fit between the fluorescent sockets to be used by the system in its replacement of fluorescent tubes</p>
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**Exhibit *Huang* in view of *Socarras References*
and further in view of *Peddinghaus***

35 U.S.C. § 103 – Claim 14

		<p>with a lower energy consuming system such as that comprised of LEDs mounted along an elongate support member and in particular such a member in the shape of an “<i>I-beam</i>.” <i>Peddinghaus</i> offers the solution to that cutting to fit. “<i>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.</i>” (Col. 3, ll. 31-34 of <i>Peddinghaus</i>). It would have been known to the person or 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 LED lamps if the system were to be convenient in application. As to the cross-sectional shape of the elongate support member as disclosed in <i>Breihof</i> ’835 and earlier disclosed by the <i>Socarras References</i>, 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</p>
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**Exhibit *Huang* in view of *Socarras References*
and further in view of *Peddinghaus***

35 U.S.C. § 103 – Claim 14

		<p>couplings. Consequently, a person of ordinary skill in the art, knowing the teachings of <i>Huang</i> and the <i>Socarras</i> references 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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