

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

RETROLED COMPONENTS, LLC,  
Plaintiff,

v.

PRINCIPAL LIGHTING GROUP, LLC  
Defendant.

§  
§  
§  
§  
§  
§  
§  
§  
§

Civil Case No. 6:18-cv-55-ADA

JURY TRIAL DEMANDED

EXHIBIT TO  
RETROLED COMPONENTS, LLC'S  
INITIAL DISCLOSURES OF  
INVALIDITY

Exhibit *Withers* in view of *Schmitt*

35 U.S.C. § 103 – Claim 16

|                           |  |   |  |  |
|---------------------------|--|---|--|--|
| <b><u>US9311835</u></b>   |  | <b>Patent US 9,311,835 Claim Chart –<br/><i>Breihof</i> '835</b>                      | <b><i>Exhibit Withers in view of Schmitt</i></b><br><b><u>35 U.S.C. §103 – Claim 16</u></b>  |  |
| <b>Assignee:</b>          |  | SignComp, LLC   |  |  |
| <b>Title:</b>             |  | Lighting mount for interior-lighted signage and method of retrofitting a lighted sign | <b><u>Withers</u></b><br><b>US Patent No. 8,419,223</b><br><b>Priority Date: 4/23/2009</b><br><b>Issued: 4/16/2013</b>   |  |
| <b>Filing Date:</b>       |  | 2011-11-22  | <b><u>Schmitt</u></b><br><b>US Patent No. 4,748,545</b><br><b>Filed: 2/20/1986</b><br><b>Issued: 5/31/1988</b>   |  |
| <b>Publication Date:</b>  |  | 2016-04-12  |  |  |
| <b>Inventor:</b>          |  | Breihof, Thomas C.  |  |  |
| <b>Earliest Priority:</b> |  | US 61417156<br>2010-11-24   |  |  |
| <b>Claims:</b>            |  |   |  |  |
| 13                        | Claim 13   |   | See Narrative Contention B and its Exhibits.   |  |
| 16                        | <p>The method of claim 13, further comprising:</p> <p style="padding-left: 40px;">providing a low-voltage power source for energizing the electric lamp units; and</p> <p style="padding-left: 40px;">electrically coupling the electric lamp units to the low-voltage power source.</p> |   | <p>Dependent claim 16 is invalid as being obvious under 35 U.S.C. § 103 over <i>Withers</i> in view of <i>Schmitt</i>. <i>Schmitt</i> discloses various low voltage illumination systems for use in display cases and in some embodiments replace fluorescent bulbs, some of which system are said to be “<i>particularly advantageous in that it provides a direct replacement for existing fluorescent tubes within existing fluorescent fixtures...</i>” (<i>Schmitt</i>, Col. 8, ll.10-13.) The systems disclosed in <i>Schmitt</i> include a plurality of low voltage lamps along a</p> |  |

**EXHIBIT XX – Claim 16**

**RetroLED Components LLC v. Principal Lighting Group, LLC**

*Withers in view of Schmitt*

**35 U.S.C. §103**

reflector system or in a housing for retro-fit. As *Schmitt* states, “[t]he housing 202 in combination with the end caps and axially extending conductors, is selected to be of the same length and diameter as a fluorescent tube of a given wattage. Thus, the modular illumination system 200 is intended as a direct replacement for a correspondingly, physically-sized, fluorescent tube, such as where its use as a retrofit system is desired.” (*Schmitt*, Col. 8, ll. 54-60.) In one disclosed system in *Schmitt* details as to provision of low voltage power is provided. “Electrical energy can be supplied to the illumination system 60 via a low-voltage wiring system 110. The wiring system 110 can be coupled to a transformer, corresponding to the transformer 54, which can be located in the ballast compartment of the cabinet C4.” (*Schmitt*, Col. 6, ll. 29-33.) *Schmitt* goes on to disclose how the low voltage is conveyed, “Low-voltage electrical energy can be supplied to the light sources 152 via the axially extending conducting members 130,132 in combination with conductive

**EXHIBIT XX – Claim 16**

**RetroLED Components LLC v. Principal Lighting Group, LLC**

*Withers in view of Schmitt*

**35 U.S.C. §103**

|  |  |  |
|--|--|--|
|  |  | <p><i>members 158, for example, low voltage wires, within the housing 122.”</i></p> <p><i>(Schmitt, Col. 7, ll. 48-51.) Thus, Schmitt discloses “providing a low-voltage power source for energizing the electric lamp units and electrically coupling the electric lamp units to the low voltage power source” as recited in claim 16. Thus, a person of ordinary skill in the art, devising methods and systems to replace fluorescents with lower powered electric lamps and knowing the disclosures of Huang and Schmitt, would be motivated to combine the teachings of those references in connecting the low voltage lamp units to the low voltage power source thus rendering claim 16, as a whole, obvious.</i></p> |
|--|--|--|