

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 *Schmitt*
and/or *Tieszen*

35 U.S.C. § 103 – Claim 17

<u>US9311835</u>	Patent US 9,311,835 Claim Chart – Breihof '835	Exhibit <i>Huang</i> in view of <i>Schmitt</i> and/or <i>Tieszen</i>		
Assignee:	SignComp, LLC	<u>35 U.S.C. §103– Claim 17</u>		
Title:	Lighting mount for interior-lighted signage and method of retrofitting a lighted sign	<u>Huang</u>	<u>Schmitt</u>	<u>Tieszen</u>
Filing Date:	2011-11-22	US Pub. No. 2009/0027916 A1	US Patent No. 4,748,545	US Patent No. 4,376,966
Publication Date:	2016-04-12	Priority Date: 12/14/2005	Filed: 2/20/1986	Filed: 4/7/1980
Inventor:	Breihof, Thomas C.	Filed: 7/22/2008	Issued: 5/31/1988	Issued: 3/15/1983
Earliest Priority:	2010-11-24, US 61417156	Published: 1/29/2009		
Claims:				
<i>13</i>	Claim 13	See Narrative Contention A and its Exhibits.		
<i>16</i>	The method of claim 13, further comprising: 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.	See Narrative Contention CC and its Exhibits.		

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17	<p>The method of claim 16, wherein said positioning one or more electric lamp units along the elongate support member further comprises routing low-voltage electrical wiring associated with the electric lamp units along at least a portion of the elongate support member and electrically connecting the electrical wiring to the low voltage power source.</p>	<p>Dependent claim 17 is invalid as being obvious under 35 U.S.C. § 103 over <i>Huang</i> in view of <i>Schmitt</i> and/or U.S. Pat. No. 4,376,966 to Tieszen issued March 15, 1983 from an application filed April 7, 1980 (“<i>Tieszen</i>”). Claim 17 depends from dependent claim 16 which in turn depends on independent claim 13. Narrative Contention A and its exhibits demonstrates that claim 1 is anticipated by <i>Huang</i>. Narrative Contention CC above demonstrates that claim 16 is invalid as obvious over <i>Huang</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 reflector system or in a housing for retro-fit. As <i>Schmitt</i> states, “<i>The housing 202 in combination with the end caps and axially extending conductors, is selected to be of the same</i></p>
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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 members 158, for example, low voltage wires, within the housing 122.” (Schmitt, Col. 7, ll. 48-51.)* The limitations added to claim 16 by claim 17 as to routing low voltage electric wiring associated with the electric lamp units

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along at least a portion of the elongate support member and electrically connecting the electric wiring to the low voltage power source is disclosed by *Schmitt and Tieszen*, which is entitled, “*Strip Lights and Method of Making the Same*,” and discloses in detail various aspects of routing low voltage wiring in a strip light in which the low voltage lamps are supported by an elongate tubular member or channel. For example, as to the detail of wiring, *Tieszen* states, “*For a purpose to be presently explained, the tubular member is preferably not circular in transverse cross section, but rather of a "D" or symmetrical trapezoid configuration as may be seen on inspection of FIG. 5. The external dimensions of the tubular member 16 can, by way of example only, be such that the spacing of its parallel sides is 0.277 inch with such sides having widths of 0.165 inch and 0.389 inch. The wall thickness is about 0.040 inch. Such size is well suited for use with size T-1 lamps hereinafter mentioned. The lamp assembly 12 includes a lamp and electric harness designated generally at 18 that is constituted of a plurality of electric lamps*

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20 that are connected in electrical parallel between a pair of electric conductors 22 and 24 which can be of copper and size No. 28. The lamps 20 are conventional incandescent lamps in that they include a glass envelope surrounding a filament (not shown) that is energized by a pair of flexible electric leads 26 and 28 extending from the envelope. The lamps 20 are preferably at least as small as lamps known in the art and obtainable from many hobby shops as "wheat" lamps. Still smaller lamps are especially preferred such as size T-1 that draw 30 ma from a 12 volt power source. Such lamps consume only about 0.36 watt and result in only a slight temperature rise in their surroundings. The small amount of heat generated appears to be readily conducted away by the leads and otherwise dissipated even when very little, if any, free ambient air movement can occur. Indeed, it appears that very little temperature rise can be caused by the small lamps even when affirmative steps are taken to minimize the dissipation of heat. In the assembly 18 as shown in FIG. 8, it will be seen that the flexible conductors 22 and 24

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are in closely spaced and in substantial parallelism, with the leads 26 and 28 of the lamps being mechanically and electrically connected respectively to the conductors 24 and 22. Each of such connections preferably involving a lead being twisted about and soldered to its respective conductor, such as, for example, the connection of the lead 26 to the conductor 24 indicated at 30, and the connection of the lamp lead 28 to the conductor 22 indicated at 32. Alternatively, the connections 30 and 32 can simply be spot welded connections. It will be noted that the leads 26 and 28 of each lamp 20 extend in opposite directions from each other and in approximate parallelism with the conductors 22 and 24. All the leads 26 extend in the same direction, with the length of the connected leads 26 and 28 and the spacing of the lamps 20 being such that the connections 30 and 32 occur alternately and in spaced relation to each other. In other words the overall longitudinal extent of the leads of each lamp is longitudinally spaced from the leads of adjacent lamps. In particular, no lead 26 contacts any other lead 28.” (Col. 4, ll 1 – 55

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		<p><i>Tieszen</i>). Thus, a person of ordinary skill in the art would find claim 17 of the <i>Breihof</i> '835 patent obvious, as a whole, over <i>Huang</i> in view of <i>Schmitt</i> and/or <i>Tieszen</i>.</p>
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