

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAVANT TECHNOLOGIES LLC d/b/a GE LIGHTING,
ELONG INTERNATIONAL USA INC., AND
XIAMEN LONGSTAR LIGHTING CO. LTD.,
Petitioners,

v.

FEIT ELECTRIC COMPANY, INC.,
Patent Owner.

Case No. IPR2025-00698
Patent No. 8,614,539

**DECLARATION OF ETAI LAHAV IN SUPPORT OF
PETITIONERS' NOTICE OF INTENT TO DESIGNATE
PROVISIONALLY-RECOGNIZED PTAB ATTORNEY
AS BACK-UP COUNSEL (37 CFR § 42.10(c)(2))**

I, Etai Lahav, hereby declare the following:

1. I am a partner at the law firm Radulescu LLP. I have over seventeen years of experience as a patent litigator and have represented clients in numerous patent litigation cases in various United States Courts and the Court of Appeals for the Federal Circuit.

2. I am comfortable and experienced with technically and legally complex issues of the kinds that are likely to present themselves in this proceeding. In particular, I am experienced with technically and legally complex matters in the semiconductor and electronics field, including the following exemplary cases:

- *ZOND, LLC v. Intel Corp.*, Civ. Case No. 1-13-cv-11570 (D. Mass. 2013)
- *Finisar Corp. v. Nistica, Inc.*, Civ. Case No. 5-13-cv-03345 (N.D. Cal. 2013)
- *Thomas Swan & Co. Ltd. v. Finisar Corp.*, Civ. Case No. 2-13-cv-00178 (E.D. Tex. 2013)
- *Mears Technologies, Inc. v. Finisar Corp.*, Civ. Case No. 2-13-cv-00376 (E.D. Tex. 2013)
- *Lambeth Magnetic Structures, LLC v. Toshiba Corp. et al.*, Civ. Case No. 2-14-cv-01526 (W.D. Pa. 2014)
- *Koninklijke Philips NV et al v. Wangs Alliance Corp. d/b/a WAC Lighting Co.*, Civ. Case No. 1-14-cv-12298 (D. Mass. 2014)
- *Mears Technologies, Inc. v. Finisar Corp.*, Civ. Case No. 16-1485 (Fed. Cir. 2016)

- *Golight, Inc. v. AAC Enterprises LLC, et al.*, Civ. Case No. 1-16-cv-01181 (D. Colo. 2016)
- *ilumisys, Inc. d/b/a TOGGLED v. Woodforest Lighting, Inc. d/b/a Forest Lighting USA*, Civ. Case No. 4-16-cv-02793 (S.D. Tex. 2016)
- *Finisar Corp. v. Nistica, Inc.*, Civ. Case No. 17-1649 (Fed. Cir. 2017)
- *Wangs Alliance Corp. v. Koninklijke Philips N.V.*, Civ. Case No. 17-1527 (Fed. Cir. 2017)
- *Philips Lighting Holding B.V. v. Wangs Alliance Corp.*, Civ. Case No. 17-1529 (Fed. Cir. 2017)
- *Wangs Alliance Corp. v. Koninklijke Philips N.V.*, Civ. Case No. 17-1530 (Fed. Cir. 2017)
- *Wangs Alliance Corp. v. Philips Lighting North America*, Civ. Case No. 17-1531 (Fed. Cir. 2017)
- *Wangs Alliance Corp. v. Philips Lighting North America*, Civ. Case No. 17-1532 (Fed. Cir. 2017)
- *Philips Lighting North America Corp. et al v. Howard Industries, Inc. d/b/a Howard Lighting*, Civ. Case No. 2-18-cv-00012 (S.D. Miss. 2018)
- *UPF Innovations, LLC v. Synopsys, Inc.*, Civ. Case No. 2-18-cv-00199 (E.D. Tex. 2018)
- *Fiber, LLC v. Ciena Corp.*, Civ. Case No. 19-1005 (Fed. Cir. 2018)
- *Seoul Semiconductor Co., Ltd. et al v. Satco Products, Inc.*, Civ. Case No. 2-19-cv-04951 (EDNY)
- *Seoul Semiconductor Co., Ltd. et al v. Satco Products, Inc.*, Civ. Case No. 1-19-cv-06719 (EDNY)
- *Satco Products, Inc. v. Seoul Semiconductor Co., Ltd. et al.*, Civ. Case No. 1-21-cv-00643 (NDGA)

- *Nitride Semiconductors Co., Ltd. v. Lite-On Technology Corporation et al.*, Civ. Case No. 6-21-cv-00183 (WDTX)
- *Sensor Electronic Technology, Inc. v. Lite-On Technology Corporation et al.*, Civ Case No. 6-21-cv-00322 (WDTX)
- *Nitek, Inc. v. Lite-On Technology Corporation et al.*, Civ. Case No. 6-21-cv-00794 (WDTX)
- *Intel Corp. v. Institute of Microelectronics of the Chinese Academy of Sciences*, IPR2018-01574,
- *Intel Corp. v. Institute of Microelectronics of the Chinese Academy of Sciences*, IPR2019-00834,
- *Satco Products, Inc. v. Seoul Semiconductor Co., Ltd.*, IPR2020-00247,
- *Satco Products, Inc. v. Seoul Semiconductor Co., Ltd.*, IPR2020-00836,
- *Sensor Electronic Technology, Inc. v. Lite-On Technology Corporation*, IPR2022-00395,
- *Sensor Electronic Technology, Inc. v. Genesis Photonics Inc. et al.*, IPR2022-00396,
- *Sensor Electronic Technology, Inc. v. Genesis Photonics Inc. et al.*, IPR2022-00397,
- *Sensor Electronic Technology, Inc. v. Lite-On Technology Corporation et al.*, IPR2022-00406,
- *Sensor Electronic Technology, Inc. v. Lite-On Technology Corporation et al.*, IPR2022-00419,
- *Lite-On Technology Corporation v. Sensor Electronic Technology, Inc.*, IPR2022-00780,
- *Lite-On Technology Corporation v. Sensor Electronic Technology, Inc.*, IPR2022-00781 (PTAB),

- *Seoul Semiconductor Co., Ltd. et al v. Finelite, Inc.*, 3-22-cv-02869 (NDCA)
 - *Seoul Semiconductor Co., Ltd. et al v. Feit Electric Company, Inc.*, 2-22-cv-05097 (CDCA)
 - *LED Wafer Solutions LLC v. Samsung Electronics Co., Ltd. et al*, 3-22-cv-04809 (NDCA)
 - *Seoul Semiconductor Co., Ltd. et al v. GE Healthcare, Inc.*, 1-22-cv-01455 (DDE)
 - *Lexington Luminance LLC v. Technical Consumer Products, Inc.*, 5-22-cv-02235 (NDOH)
 - *Certain LED Landscape Lighting Devices, Components Thereof, and Products Containing Same; Inv. No. 337-TA-1358 (Violation)*
 - *Wangs Alliance Corporation d/b/a WAC Lighting v. Hinkley Lighting, Inc.*, 1-23-cv-00486 (NDOH),
 - *Nitek, Inc. v. Photon Wave Co., Ltd.*, 2-23-cv-00420 (EDTX),
 - *Smart Ceiling Fans, Components Thereof, and Associated Systems and Software; Inv. No. 337-TA-1374 (Violation)*
 - *Wangs Alliance Corporation d/b/a WAC Lighting v. VC Brands, LLC et al*, 1-23-cv-01394 (DDE)
 - *Feit Electric Company, Inc. v. Savant Technologies LLC d/b/a GE Lighting*, 1-24-cv-00473 (NDOH)
 - *Seoul Viosys Co., Ltd. v. FEIT Electric Co., Inc.*, 2-24-cv-04238 (CDCA)
 - *Sensor Electronic Technology, Inc. v. Laser Components USA, Inc.*, 1-24-cv-00272 (DNH)
3. I have appeared *pro hac vice* in the following *inter partes* review

proceedings: IPR2014-00477, IPR2014-00479, IPR2014-00578, IPR2014-00580,

IPR2014-00604, IPR2014-00726, IPR2014-00799, IPR2014-00803, IPR2014-00807, IPR2014-00808, IPR2014-01099, IPR2014-01100, IPR2018-01574, IPR2019-00834, IPR2020-00247, IPR2020-00836, IPR2022-00395, IPR2022-00396, IPR2022-00397, IPR2022-00406, IPR2022-00419, IPR2022-00780, IPR2022-00781, and IPR2023-01357.

4. I am a member in good standing of the Bar of the State of New York. I am admitted to practice before the United States Court of Appeals for the Federal Circuit.

5. I have never been suspended or disbarred from practice before any court or administrative body.

6. I have never had a court or administrative body deny my application for admission to practice.

7. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R.

8. I agree to be subject to the United States Patent and Trademark Office Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et seq., and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

9. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are

believed to be true; and further that these statements are made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Date: March 6, 2025

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