

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

FEIT ELECTRIC COMPANY, INC.,

Plaintiff,

v.

SAVANT TECHNOLOGIES LLC
d/b/a GE LIGHTING,

Defendant.

Case No. 1:24-cv-00473-BMB

STIPULATION

In this matter, Plaintiff Feit Electric Company, Inc. accuses certain products of Defendant Savant Technologies LLC of patent infringement (Dkt. 27), and Savant raises certain defenses and counterclaims (Dkt. 41). In particular, Savant has argued that the asserted claims of U.S. Patents Nos. 8,604,678 and 8,614,539 are invalid as indefinite. (Dkt. 45).

This case is stayed pending resolution of related *inter partes* review proceedings at the Patent Trial and Appeal Board. (Apr. 1, 2025 Dkt. Order). In connection with representations made by Savant in those proceedings, Savant stipulates that it will no longer argue in this action that the asserted claims are indefinite, and Savant withdraws any argument or contention that the asserted claims are indefinite. Savant further stipulates that the relevant terms¹ have plain and ordinary meanings consistent with the Memorandum Opinion and Order entered by District Judge Brantley

¹ That is, the terms “improves an off-state white appearance of the wavelength conversion component,” “improves an OFF state white appearance of the wavelength conversion component,” and “an average particle size that improves the OFF state white appearance of the wavelength conversion component.”

Starr in the related litigation in the Northern District of Texas. *Feit Electric Co. Inc. v. Elong Int'l Inc, et al.*, No. 3:24-cv-1089, Dkt. 81 (N.D. Tex. July 2, 2025).

This stipulation does not constitute a request that the case, which is administratively closed, be reopened.

Dated: March 3, 2026

Respectfully submitted,

/s/ Jonathan Auerbach

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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument was served or delivered electronically via U.S. District Court [LIVE]- Document Filing System, to all counsel of record on March 3, 2026.

/s/ Jonathan Auerbach
Jonathan Auerbach