

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 IPR2025-00698
U.S. Patent No. 8,614,539

**PATENT OWNER'S OBJECTIONS
TO PETITIONERS' REPLY EVIDENCE**

Mail Stop Patent Board
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

I. INTRODUCTION

Patent Owner Feit Electric Company, Inc. (“Patent Owner” or “Feit Electric”) objects to Petitioners’ exhibits EX1169-EX1173, EX1176-EX1179, EX1181, EX1184-EX1187, EX1190-EX1194, and EX1197 for failure to comply with the Federal Rules of Evidence. 37 C.F.R. § 42.62(a). These objections are filed under § 42.64(b)(1).

Regardless of whether the Board admits these exhibits, Petitioners’ arguments based on the exhibits are facially wrong, as Patent Owner will explain in due course in its sur-reply brief. In the meantime, Patent Owner preserves its rights by lodging these objections based on relevance, hearsay, lack of authentication, lack of affirmation, and improper use of exhibits to circumvent the Board’s page limits on Petitioners’ briefing.

II. OBJECTIONS

A. Allegations Related to Dr. Schubert

EX1169-EX1173, EX1177-EX1179, EX1181, EX1184-EX1187, and EX1190-EX1193 should be excluded as irrelevant because they do not relate in any way to the topics at issue in this proceeding; moreover, the likelihood of confusion and undue prejudice outweigh any probative value. Fed. R. Evid. 402; Fed. R. Evid. 403. Additionally, the aforementioned exhibits should be excluded

for lacking authenticity and proper affirmation. Fed. R. Evid. 603;
Fed. R. Evid. 901.

B. Exhibits Not Cited in Briefing

EX1176 should be excluded as irrelevant because it is not cited in any of
Petitioners' briefing and does not form the basis of any argument advanced by
Petitioners. Fed. R. Evid. 402.

C. Exhibits Used to Circumvent Page Limitations

EX1194 and EX1197 should be excluded as irrelevant because they consist
entirely of attorney argument (Fed. R. Evid. 402), are hearsay without any
exception (Fed. R. Evid. 802), and are improper because they serve only to
circumvent the page limitations set forth in 37 C.F.R. § 42.24(c)(1).

III. CONCLUSION

Petitioner exhibits EX1169-EX1173, EX1176-EX1179, EX1181, EX1184-
EX1187, EX1190-EX1194, and EX1197 should be excluded; if not excluded, they
should be given no weight.

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2026, a true and correct copy of the foregoing was served by electronic mail upon the following counsel of record for

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