

**Subject:** Re: SERVICE: IPR2025-00698: SAVANT TECHNOLOGIES LLC d/b/a GE LIGHTING v. Feit Electric Company, Inc.  
**Date:** Tuesday, February 3, 2026 at 10:38:24 AM Eastern Standard Time  
**From:** Andrew Brown  
**To:** DaMario, Thomas, McMahon, Charles, FeitElectricIPR  
**CC:** Savant\_IPR\_Service, David Radulescu, Etai Lahav  
**Attachments:** image001.jpg, image713207.jpg, 2026.02.03 IPR2024-01357, IPR2025-00260, -00698 False Testimony of Dr. Schubert.pdf, Exhibits.zip

Tom,

As Feit should know by now, Dr. Schubert gave false testimony in IPR2024-01357 when he asserted that he had never been the subject of an investigation involving allegations of dishonesty or fraud.

Since that false denial, Dr. Schubert has continued to deny any knowledge or recollection of the NSF investigation into alleged SBIR grant fraud by him--even when confronted with the closeout memorandum for that investigation during his deposition in the NDTX district court case. So Petitioners investigated further, and that investigation rendered clear and convincing evidence that, while under oath, Dr. Schubert made false statements material to evaluating his credibility in these proceedings, with knowledge of the statements' falsity.

As discussed in the attached letter, consistent with Feit's and Dr. Schubert's obligations under 37 CFR s. 42.11 and counsel's obligations under 37 CFR s. 11.303(a)(3), Petitioners urge Dr. Schubert's testimony be withdrawn and remedial measures taken, including disclosure to the Board.

Given the seriousness of Dr. Schubert's conduct, if such measures are not taken, Petitioners must insist the deposition go forward in person. Given Dr. Schubert's concerns about traveling to NYC, we are willing to travel to Troy and/or reschedule the deposition for next week, particularly if Dr. Schubert is arranging for his own counsel too. But in any case, Petitioners would expect Dr. Schubert to come prepared to testify regarding the matters in the attached.

Please let us know if you would like to discuss.

Thanks,  
Andy

212-713-0356  
[andy@radip.com](mailto:andy@radip.com)

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**From:** DaMario, Thomas <[TDaMario@beneschlaw.com](mailto:TDaMario@beneschlaw.com)>  
**Date:** Saturday, January 31, 2026 at 2:16 PM  
**To:** Andrew Brown <[andy@radip.com](mailto:andy@radip.com)>, McMahon, Charles <[CMcMahon@beneschlaw.com](mailto:CMcMahon@beneschlaw.com)>, FeitElectricIPR <[FeitElectricIPR@beneschlaw.com](mailto:FeitElectricIPR@beneschlaw.com)>  
**Cc:** Savant\_IPR\_Service <[Savant\\_IPR\\_Service@radip.com](mailto:Savant_IPR_Service@radip.com)>, David Radulescu <[david@radip.com](mailto:david@radip.com)>, Etai Lahav <[etai@radip.com](mailto:etai@radip.com)>  
**Subject:** RE: SERVICE: IPR2025-00698: SAVANT TECHNOLOGIES LLC d/b/a GE LIGHTING v. Feit Electric Company, Inc.

Andy,

Dr. Schubert messaged this morning indicating that he has come down with a cold due to the weather in upstate New York. He is on the mend but is concerned about traveling during what is currently looking to be an extended cold spell through the end of next week. Do you have any objections to taking the deposition remotely?

Thank you,  
Tom



Thomas DaMario  
(he/him/his)  
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**From:** DaMario, Thomas <[TDaMario@beneschlaw.com](mailto:TDaMario@beneschlaw.com)>  
**Sent:** Thursday, January 22, 2026 12:37 PM  
**To:** Andrew Brown <[andy@radip.com](mailto:andy@radip.com)>; McMahon, Charles <[CMcMahon@beneschlaw.com](mailto:CMcMahon@beneschlaw.com)>; FeitElectricIPR <[FeitElectricIPR@beneschlaw.com](mailto:FeitElectricIPR@beneschlaw.com)>  
**Cc:** Savant\_IPR\_Service <[Savant\\_IPR\\_Service@radip.com](mailto:Savant_IPR_Service@radip.com)>; David Radulescu <[david@radip.com](mailto:david@radip.com)>; Etai Lahav <[etai@radip.com](mailto:etai@radip.com)>  
**Subject:** RE: SERVICE: IPR2025-00698: SAVANT TECHNOLOGIES LLC d/b/a GE LIGHTING v. Feit Electric Company, Inc.

Thanks Andy,

Prior to the deposition, please let us know the names of the individuals attending (including stenographer and videographer) so that we can add everyone to the building security list.

Best,  
Tom



Thomas DaMario  
(he/him/his)  
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**From:** Andrew Brown <[andy@radip.com](mailto:andy@radip.com)>  
**Sent:** Wednesday, January 21, 2026 4:40 PM  
**To:** DaMario, Thomas <[TDaMario@beneschlaw.com](mailto:TDaMario@beneschlaw.com)>; McMahon, Charles <[CMcMahon@beneschlaw.com](mailto:CMcMahon@beneschlaw.com)>; FeitElectricIPR <[FeitElectricIPR@beneschlaw.com](mailto:FeitElectricIPR@beneschlaw.com)>  
**Cc:** Savant\_IPR\_Service <[Savant\\_IPR\\_Service@radip.com](mailto:Savant_IPR_Service@radip.com)>; David Radulescu <[david@radip.com](mailto:david@radip.com)>; Etai Lahav <[etai@radip.com](mailto:etai@radip.com)>

**Subject:** Re: SERVICE: IPR2025-00698: SAVANT TECHNOLOGIES LLC d/b/a GE LIGHTING v. Feit Electric Company, Inc.

Thanks, Tom. That works for us.

212-713-0356  
[andy@radip.com](mailto:andy@radip.com)

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**From:** DaMario, Thomas <[TDaMario@beneschlaw.com](mailto:TDaMario@beneschlaw.com)>

**Date:** Wednesday, January 21, 2026 at 2:29 PM

**To:** Andrew Brown <[andy@radip.com](mailto:andy@radip.com)>, McMahon, Charles <[CMcMahon@beneschlaw.com](mailto:CMcMahon@beneschlaw.com)>, FeitElectricIPR <[FeitElectricIPR@beneschlaw.com](mailto:FeitElectricIPR@beneschlaw.com)>

**Cc:** Savant\_IPR\_Service <[Savant\\_IPR\\_Service@radip.com](mailto:Savant_IPR_Service@radip.com)>, David Radulescu <[david@radip.com](mailto:david@radip.com)>, Etai Lahav <[etai@radip.com](mailto:etai@radip.com)>

**Subject:** RE: SERVICE: IPR2025-00698: SAVANT TECHNOLOGIES LLC d/b/a GE LIGHTING v. Feit Electric Company, Inc.

Hi Andy,

Dr. Schubert is available on Friday, February 6. We can host the deposition at the Benesch office in New York (1155 Avenue of the Americas, Floor 26). Please confirm that this works for you. We have no objections to the deposition being video-recorded.

Best,  
Tom



Thomas DaMario  
(he/him/his)  
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**From:** Andrew Brown <[andy@radip.com](mailto:andy@radip.com)>

**Sent:** Tuesday, January 20, 2026 9:50 AM

**To:** McMahon, Charles <[CMcMahon@beneschlaw.com](mailto:CMcMahon@beneschlaw.com)>; DaMario, Thomas <[TDaMario@beneschlaw.com](mailto:TDaMario@beneschlaw.com)>; FeitElectricIPR <[FeitElectricIPR@beneschlaw.com](mailto:FeitElectricIPR@beneschlaw.com)>

**Cc:** Savant\_IPR\_Service <[Savant\\_IPR\\_Service@radip.com](mailto:Savant_IPR_Service@radip.com)>; David Radulescu <[david@radip.com](mailto:david@radip.com)>; Etai Lahav <[etai@radip.com](mailto:etai@radip.com)>

**Subject:** Re: SERVICE: IPR2025-00698: SAVANT TECHNOLOGIES LLC d/b/a GE LIGHTING v. Feit Electric Company, Inc.

Counsel,

It has been two weeks, so I am following up on this. Please let us know when Dr. Schubert is available for his deposition in the first three weeks of February and where he will be made available. Please also confirm that Feit does not object to the deposition being video-recorded.

Thanks,  
Andy

212-713-0356  
[andy@radip.com](mailto:andy@radip.com)

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**From:** Andrew Brown <[andy@radip.com](mailto:andy@radip.com)>  
**Date:** Monday, January 5, 2026 at 4:57 PM  
**To:** McMahon, Charles <[cmcmahon@beneschlaw.com](mailto:cmcmahon@beneschlaw.com)>, DaMario, Thomas <[tdamario@beneschlaw.com](mailto:tdamario@beneschlaw.com)>, FeitElectricIPR <[FeitElectricIPR@beneschlaw.com](mailto:FeitElectricIPR@beneschlaw.com)>  
**Cc:** Savant\_IPR\_Service <[Savant\\_IPR\\_Service@radip.com](mailto:Savant_IPR_Service@radip.com)>, David Radulescu <[david@radip.com](mailto:david@radip.com)>, Etai Lahav <[etai@radip.com](mailto:etai@radip.com)>  
**Subject:** Re: SERVICE: IPR2025-00698: SAVANT TECHNOLOGIES LLC d/b/a GE LIGHTING v. Feit Electric Company, Inc.  
Counsel, please let us know Dr. Schubert's availability for deposition in February. Thanks.

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**From:** Baker, Jodi <[jrbaker@beneschlaw.com](mailto:jrbaker@beneschlaw.com)>  
**Date:** Tuesday, December 30, 2025 at 4:25 PM  
**To:** Savant\_IPR\_Service <[Savant\\_IPR\\_Service@radip.com](mailto:Savant_IPR_Service@radip.com)>, David Radulescu <[david@radip.com](mailto:david@radip.com)>, Etai Lahav <[etai@radip.com](mailto:etai@radip.com)>, Andrew Brown <[andy@radip.com](mailto:andy@radip.com)>  
**Cc:** FeitElectricIPR <[FeitElectricIPR@beneschlaw.com](mailto:FeitElectricIPR@beneschlaw.com)>  
**Subject:** SERVICE: IPR2025-00698: SAVANT TECHNOLOGIES LLC d/b/a GE LIGHTING v. Feit Electric Company, Inc.  
Counsel:

Attached are the documents filed with the PTAB in IPR2025-00698 this afternoon.

Best regards,  
Jodi

**UNITED STATES PATENT AND TRADEMARK OFFICE  
PATENT TRIAL AND APPEAL BOARD**

Document Filing Notice

**AIA Review No.:** IPR2025-00698  
**Petitioner:** SAVANT TECHNOLOGIES LLC d/b/a GE LIGHTING of , OH  
**Patent Owner:** Feit Electric Company, Inc. of , CA  
**Patent No.:** 8614539  
**Submitted Date:** 12/30/2025

**Submitted By:** Charles McMahon, [cmcmahon@beneschlaw.com](mailto:cmcmahon@beneschlaw.com)

The following document(s) has/have been filed.

**Document(s) List**

No.	Document No.	Document Type	Document Name	Filing Party	Availability
1	14	PO Response to Pet	Patent Owner's Response	Patent owner	Available for everyone.
2	2038	Exhibit	2025-01-17 Savant Final ID of Claim Terms 539 patent	Patent owner	Available for everyone.
3	2039	Exhibit	2025-02-25 Savant Final Constructions 539 patent	Patent owner	Available for everyone.
4	2040	Exhibit	2025-03-13 [045] Savant Opening Claim Construction Brief	Patent owner	Available for everyone.



Jodi R. Baker  
(she/her/hers)  
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