

- Lumileds LUXEON Z ES (LXZ2-4070) LED Package

**b. Infringement of the '053 Patent**

220. On information and belief, the Lumileds Respondents import, sell for importation, and/or sell after importation into the United States certain Lumileds Accused Products that infringe the '053 Patent.

221. The Lumileds Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 11-5, 7, 11-14, 16-20, 22, and 26-29 of the '053 Patent, in violation of 35 U.S.C. § 271(a). The Lumileds Respondents directly infringe at least these claims by importing, selling for importation, and/or selling after importation into the United States the Lumileds Accused Products. The Lumileds Accused Products satisfy all claim limitations of claims 1-5, 7, 11-14, 16-20, 22, and 26-29 of the '053 Patent at the time of importation into the United States.

222. Moreover, on information and belief, one or more of the Lumileds Respondents knowingly and intentionally induces infringement of the '053 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import Lumileds Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the Lumileds Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the Lumileds Respondents sells the Lumileds Accused Products or otherwise provides the Lumileds Accused Products to distributors knowing that these distributors intend to import and/or sell the Lumileds Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the Lumileds Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement

of the Asserted Patents by making, using, selling, offering to sell, and/or importing the Lumileds Accused Products.

223. A claim chart comparing claims 1-5, 7, 11-14, 16-20, 22, and 26-29 of the '053 Patent to a representative Lumileds Accused Product, the Lumileds LUXEON IR Domed (L1I0-0850060000000) LED Package, is attached here as Confidential Exhibit 46C. The Lumileds LUXEON IR Domed (L1I0-0850060000000) LED Package is also submitted with this Complaint as Physical Exhibit P8.

224. Additionally, on information and belief, including based on teardown analyses and imaging, at least the following additional products constitute Lumileds Accused Products that infringe the '053 Patent for the reasons set forth above:

- Lumileds LUXEON® Rebel LEDs (LXMA-PL02-0100)
- Lumileds LUXEON® H50-2 (LXAC-1827)
- Lumileds LUXEON F ES (LFXH-C2B-0200)
- Lumileds LUXEON Rebel (LXML-PWC1-0100)
- Lumileds LUXEON CZ Color (L1CU-5070000000000)
- Lumileds LUXEON V2 (L1V2-5770000000000)
- Lumileds LUXEON C Color (L1C1-5790000000000)
- Lumileds LUXEON Rebel PLUS (LX18-P150-3)
- Lumileds LUXEON Rebel ES (LXML-PWC2)
- Lumileds LUXEON V (L1V1-407003V500000)
- Lumileds LUXEON MX (L1MX-407012V500000)
- Lumileds LUXEON M (LXR7-SW40)
- Lumileds Z ES (LXZ2-3580-3)
- Lumileds LUXEON MZ (LMZ7-RW65)
- Lumileds LUXEON TX (L1T2-3070000000000)
- Lumileds LUXEON C Color Line (L1C1-FRD1000000000)
- Lumileds LUXEON IR Domed (L1I0-0940060000000)
- Lumileds LUXEON MX (L1MX-407012V500000)
- Lumileds LUXEON TX (L1T2-5080000000000)
- Lumileds LUXEON V (L1V1-657003V500000)
- Lumileds LUXEON V2 (L1V2-6570000000000)
- Lumileds LUXEON F PC Amber (LFMH-L1A-0070)
- Lumileds LUXEON MZ (LMZ7-RW40)
- Lumileds LUXEON Rebel PLUS (LX18-P127-3)
- Lumileds LUXEON R (LXA7-PW50)
- Lumileds LUXEON H50-2 (LXAC-1827)

- Lumileds LUXEON Rebel Color Line (LXM3-PD01)
- Lumileds LUXEON Rebel, White & PC Amber (LXMA-PW01-0120)
- Lumileds LUXEON Rebel (LXML-PWC1-0120)
- Lumileds LUXEON Rebel ES (LXML-PWN2)
- Lumileds LUXEON M (LXR7-SW30)
- Lumileds LUXEON Z ES (LXZ2-4070)

**c. Infringement of the '421 Patent**

225. On information and belief, the Lumileds Respondents import, sell for importation, and/or sell after importation into the United States certain Lumileds Accused Products that infringe the '421 Patent.

226. The Lumileds Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 1-2, 6, and 10 of the '421 Patent, in violation of 35 U.S.C. § 271(a). The Lumileds Respondents directly infringe at least these claims by importing, selling for importation, and/or selling after importation into the United States the Lumileds Accused Products. The Lumileds Accused Products satisfy all claim limitations of claims 1-2, 6, and 10 of the '421 Patent at the time of importation into the United States.

227. Moreover, on information and belief, one or more of the Lumileds Respondents knowingly and intentionally induces infringement of the '421 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import Lumileds Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the Lumileds Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the Lumileds Respondents sells the Lumileds Accused Products or otherwise provides the Lumileds Accused Products to distributors knowing that these distributors intend to import and/or sell the Lumileds Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the Lumileds Respondents have

had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the Lumileds Accused Products.

228. A claim chart comparing claims 1-2, 6, and 10 of the '421 Patent to a representative Accused Product, the Lumileds LUXEON 3535L (MXA8-PW50-0000) LED Package, is attached here as Confidential Exhibit 47C. The Lumileds LUXEON 3535L (MXA8-PW50-0000) LED Package is also submitted with this Complaint as Physical Exhibit P9.

229. Additionally, on information and belief, including based on teardown analyses and imaging, at least the following additional products constitute Lumileds Accused Products that infringe the '421 Patent for the reasons set forth above:

- Lumileds LUXEON SunPlus 2835 (L1SP-PNK1002800000)

**E. Signify Respondents**

**1. Patent Infringement**

**a. Infringement of the '483 Patent**

230. On information and belief, the Signify Respondents import, sell for importation, and/or sell after importation into the United States certain Accused Products, including products sold under the Philips brand name (the "Signify Accused Products") that infringe the '483 Patent.

231. The Signify Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 11 and 14-16 of the '483 Patent, in violation of 35 U.S.C. §271(a). The Signify Respondents directly infringe at least these claims by importing, selling for importation, and/or selling after importation into the United States the Signify Accused Products. The Signify Accused Products satisfy all claim limitations of claims 11 and 14-16 of the '483 Patent at the time of importation into the United States.

232. Moreover, on information and belief, one or more of the Signify Respondents knowingly and intentionally induces infringement of the '483 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import Signify Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the Signify Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the Signify Respondents sells the Signify Accused Products or otherwise provides the Signify Accused Products to distributors knowing that these distributors intend to import and/or sell the Signify Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the Signify Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the Signify Accused Products.

233. A claim chart comparing claims 11 and 14-16 of the '483 Patent to a representative Signify Accused Product, the Philips LUMEC Roadfocus LED Luminaire (RF1739601/1), is attached here as Confidential Exhibit 48C.

**b. Infringement of the '053 Patent**

234. On information and belief, the Signify Respondents import, sell for importation, and/or sell after importation into the United States certain Signify Accused Products that infringe the '053 Patent, including products sold under the Philips brand name.

235. The Signify Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 7, 11, 14, 22, 26, and 29 of the '053 Patent, in violation of 35 U.S.C. § 271(a). The Signify Respondents directly infringe at least these claims by importing, selling for importation, and/or selling after importation into the United States the Signify Accused Products.

The Signify Accused Products satisfy all claim limitations of claims 7, 11, 14, 22, 26, and 29 of the '053 Patent at the time of importation into the United States.

236. Moreover, on information and belief, one or more of the Signify Respondents knowingly and intentionally induces infringement of the '053 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import Signify Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the Signify Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the Signify Respondents sells the Signify Accused Products or otherwise provides the Signify Accused Products to distributors knowing that these distributors intend to import and/or sell the Signify Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the Signify Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the Signify Accused Products.

237. A claim chart comparing claims 7, 11, 14, 22, 26, and 29 of the '053 Patent to a Signify Accused Product, the Philips LUMEC Roadfocus LED Luminaire (RF1739601/1), is attached here as Confidential Exhibit 49C.

**c. Infringement of the '421 Patent**

238. On information and belief, the Signify Respondents import, sell for importation, and/or sell after importation into the United States certain Signify Accused Products that infringe the '421 Patent, including products sold under the Philips brand name.

239. The Signify Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 1-2, 6-7, and 10 of the '421 Patent, in violation of 35 U.S.C. § 271(a). The Signify Respondents directly infringe at least these claims by importing, selling for

importation, and/or selling after importation into the United States the Signify Accused Products. The Signify Accused Products satisfy all claim limitations of claims 1-2, 6-7, and 10 of the '421 Patent at the time of importation into the United States.

240. Moreover, on information and belief, one or more of the Signify Respondents knowingly and intentionally induces infringement of the '421 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import Signify Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the Signify Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the Signify Respondents sells the Signify Accused Products or otherwise provides the Signify Accused Products to distributors knowing that these distributors intend to import and/or sell the Signify Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the Signify Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the Signify Accused Products.

241. A claim chart comparing claims 1-2, 6-7, and 10 of the '421 Patent to a representative Accused Product, the Philips Hue White 9.5W (60W Equivalent) Dimmable A19 Smart LED Light Bulb (9290011369B), is attached here as Confidential Exhibit 50C. The Philips Hue White 9.5W (60W Equivalent) Dimmable A19 Smart LED Light Bulb (9290011369B) is also submitted with this Complaint as Physical Exhibit P10.

242. Additionally, on information and belief, including based on teardown analyses and imaging, at least the following additional products constitute Signify Accused Products that infringe the '421 Patent for the reasons set forth above:

- Philips Hue White and Color 10W (60W Equivalent) A19 Smart LED Light Bulb (9290012575A)
- Philips 8.5W (60W Replacement) Non-Dimmable A19 LED Light Bulb (Soft White) (9290011350A)
- Philips 4.5W (40W Replacement) Dimmable B11 and E12 LED Light Bulb (Soft White) (9290012137C)
- Philips 14W (100W Replacement) Non-Dimmable A19 LED Light Bulb (Daylight) (9290011351A)
- Philips 6W (50W Replacement) MR16 and GU10 LED Light Bulb (9290012664)
- Philips 8.5W (60W Replacement) Non-Dimmable A19 LED Light Bulb (Soft White) (9290011350A)
- Philips 8W (60W Replacement) Non-Dimmable A19 LED Light Bulb (Daylight) (9290011352A)
- Philips 11W (65W Replacement) Dimmable BR30 LED Light Bulb (Soft White) (9290013916)
- Philips Dusk to Dawn 8W (60W Replacement) Non-Dimmable A19 LED Light Bulb (Soft White) (9290012615)
- Philips 9W (60W Replacement) Dimmable A19 LED Light Bulb (Daylight) (9290018365A)
- Philips 9.5W (75W Replacement) Non-Dimmable A19 LED Light Bulb (Daylight) (9290012194)
- Philips 8W (60W Replacement) Non-Dimmable A19 LED Light Bulb (Daylight) (9290011352A)
- Philips 4.5W (40W Replacement) Dimmable B11 LED Light Bulb (Soft White) (9290012137)
- Philips 14.5W (100W Replacement) Non-Dimmable A19 LED Light Bulb (Soft White) (9290011349A)
- Philips 5W (40W Replacement) Non-Dimmable A19 LED Light Bulb (9290012037)
- Philips 10W (60W Replacement) Dimmable G25 LED Light Bulb (Soft White) (9290011898)
- Philips 3-Way 5/8/18W (40/60/100W Replacement) A21 LED Light Bulb (9290011742)
- Philips 7W (40W Replacement) Dimmable G25 LED Light Bulb (Soft White) (9290011817)
- Philips 9W (65W Replacement) Dimmable BR30 LED Light Bulb (Soft White) (9290011555)
- Philips Hue 9.4W (72W Equivalent) 4" Retrofit Recessed LED Downlight (Cool White) (59950/11/U5)
- Philips 13W (75W Equivalent) LED Downlight 4", 5", or 6" Surface Mounted Fixture (Soft White) (51111/31/49 (PC: 800144))
- Philips 11W (65W Equivalent) LED 5" or 6" Recessed Retrofit Trim (Soft White) (59234/31/U0)



**d. Infringement of the '118 Patent**

243. On information and belief, the Signify Respondents import, sell for importation, and/or sell after importation into the United States certain Signify Accused Products that infringe the '118 Patent, including products sold under the Philips brand name.

244. The Signify Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 15, and 17 of the '118 Patent, in violation of 35 U.S.C. § 271(a). The Signify Respondents directly infringe at least these claims by importing, selling for importation, and/or selling after importation into the United States the Signify Accused Products. The Signify Accused Products satisfy all claim limitations of claims 1, 15, and 17 of the '118 Patent at the time of importation into the United States.

245. Moreover, on information and belief, one or more of the Signify Respondents knowingly and intentionally induces infringement of the '118 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import Signify Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the Signify Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the Signify Respondents sells the Signify Accused Products or otherwise provides the Signify Accused Products to distributors knowing that these distributors intend to import and/or sell the Signify Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the Signify Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the Signify Accused Products.

246. A claim chart comparing claim 1 of the '118 Patent to a Signify Accused Product, Philips 14W (100W Replacement) Non-Dimmable A19 LED Light Bulb (Daylight)

(9290011351A), is attached here as Confidential Exhibit 51C. The Philips Hue White 9.5W (60W Equivalent) Dimmable A19 Smart LED Light Bulb (9290011369B) is also submitted with this Complaint as Physical Exhibit P11.

247. Additionally, a claim chart comparing claims 15 and 17 of the '118 Patent to a Signify Accused Product, the Philips LUMEC Roadfocus LED Luminaire (RF1739601/1), is attached here as Confidential Exhibit 52C.

**e. Infringement of the '608 Patent**

248. On information and belief, the Signify Respondents import, sell for importation, and/or sell after importation into the United States certain Signify Accused Products that infringe the '608 Patent, including products sold under the Philips brand name.

249. The Signify Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 2, 6, 12-13, 16, 19-22, 24, 28, and 37 of the '608 Patent, in violation of 35 U.S.C. § 271(a). The Signify Respondents directly infringe at least these claims by importing, selling for importation, and/or selling after importation into the United States the Signify Accused Products. The Signify Accused Products satisfy all claim limitations of claims 1, 2, 6, 12-13, 16, 19-22, 24, 28, and 37 of the '608 Patent at the time of importation into the United States.

250. Moreover, on information and belief, one or more of the Signify Respondents knowingly and intentionally induces infringement of the '608 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import Signify Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the Signify Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the Signify Respondents sells the Signify Accused Products

or otherwise provides the Signify Accused Products to distributors knowing that these distributors intend to import and/or sell the Signify Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the Signify Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the Signify Accused Products.

251. A claim chart comparing claims 1, 2, 6, 12-13, 16, 19-22, 24, 28, and 37 of the '608 Patent to a Signify Accused Product, the Philips Hue System (as defined in Complainants' claim chart), is attached here as Confidential Exhibit 53C. Certain products designed and sold to be used in conjunction with the Philips Hue System, which are charted in Complainants' claim chart, are also submitted with this Complaint as Physical Exhibits P10 and P12-P15.

**f. Infringement of the '968 Patent**

252. On information and belief, the Signify Respondents import, sell for importation, and/or sell after importation into the United States certain Signify Accused Products that infringe the '968 Patent, including products sold under the Philips brand name.

253. The Signify Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claim 6 of the '968 Patent, in violation of 35 U.S.C. § 271(a). The Signify Respondents directly infringe at least this claim by importing, selling for importation, and/or selling after importation into the United States the Signify Accused Products. The Signify Accused Products satisfy all claim limitations of claim 6 of the '968 Patent at the time of importation into the United States.

254. Moreover, on information and belief, one or more of the Signify Respondents knowingly and intentionally induces infringement of the '968 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import Signify Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On

information and belief, with knowledge and intent, or with willful blindness, one or more of the Signify Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the Signify Respondents sells the Signify Accused Products or otherwise provides the Signify Accused Products to distributors knowing that these distributors intend to import and/or sell the Signify Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the Signify Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the Signify Accused Products.

255. A claim chart comparing claim 6 of the '968 Patent to a Signify Accused Product, the Philips 13W (75W Equivalent) LED Downlight 4", 5", or 6" Surface Mounted Fixture (Soft White) (51111/31/49), is attached here as Confidential Exhibit 54C. The Philips 13W (75W Equivalent) LED Downlight 4", 5", or 6" Surface Mounted Fixture (Soft White) (51111/31/49) is also submitted with this Complaint as Physical Exhibit P16.

**g. Infringement of the '844 Patent**

256. On information and belief, the Signify Respondents import, sell for importation, and/or sell after importation into the United States certain Signify Accused Products that infringe the '844 Patent, including products sold under the Philips brand name.

257. The Signify Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claim 4 of the '844 Patent, in violation of 35 U.S.C. § 271(a). The Signify Respondents directly infringe at least this claim by importing, selling for importation, and/or selling after importation into the United States the Signify Accused Products. The Signify Accused Products satisfy all claim limitations of claim 4 of the '844 Patent at the time of importation into the United States.

258. Moreover, on information and belief, one or more of the Signify Respondents knowingly and intentionally induces infringement of the '844 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import Signify Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the Signify Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the Signify Respondents sells the Signify Accused Products or otherwise provides the Signify Accused Products to distributors knowing that these distributors intend to import and/or sell the Signify Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the Signify Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the Signify Accused Products.

259. A claim chart comparing claim 4 of the '844 Patent to a Signify Accused Product, the Philips 13W (75W Equivalent) LED Downlight 4", 5", or 6" Surface Mounted Fixture (Soft White) (51111/31/49 (PC: 800144)), is attached here as Confidential Exhibit 55C. The Philips 13W (75W Equivalent) LED Downlight 4", 5", or 6" Surface Mounted Fixture (Soft White) (51111/31/49) is also submitted with this Complaint as Physical Exhibit P16.

#### **h. Infringement of the '518 Patent**

260. On information and belief, the Signify Respondents import, sell for importation, and/or sell after importation into the United States certain Signify Accused Products that infringe the '518 Patent, including products sold under the Philips brand name.

261. The Signify Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claim 9 of the '518 Patent, in violation of 35 U.S.C. § 271(a). The Signify Respondents directly infringe at least this claim by importing, selling for importation, and/or

selling after importation into the United States the Signify Accused Products. The Signify Accused Products satisfy all claim limitations of claim 9 of the '518 Patent at the time of importation into the United States.

262. Moreover, on information and belief, one or more of the Signify Respondents knowingly and intentionally induces infringement of the '518 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import Signify Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the Signify Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the Signify Respondents sells the Signify Accused Products or otherwise provides the Signify Accused Products to distributors knowing that these distributors intend to import and/or sell the Signify Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the Signify Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the Signify Accused Products.

263. A claim chart comparing claim 9 of the '518 Patent to a Signify Accused Product, the Philips 11W (65W Equivalent) LED 5" or 6" Recessed Retrofit Trim (Soft White) (59234/31/U0), is attached here as Confidential Exhibit 56C. The Philips 11W (65W Equivalent) LED 5" or 6" Recessed Retrofit Trim (Soft White) (59234/31/U0) is also submitted with this Complaint as Physical Exhibit P17.

**F. MLS Respondents**

**1. Patent Infringement**

**a. Infringement of the '483 Patent**

264. On information and belief, the MLS Respondents import, sell for importation, and/or sell after importation into the United States certain Accused Products, including LEDVANCE, LLC products and certain products sold under the Sylvania and Osram brand names (the "MLS Accused Products") that infringe the '483 Patent.

265. The MLS Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 11, 14, and 16 of the '483 Patent, in violation of 35 U.S.C. § 271(a). The MLS Respondents directly infringe at least these claims by importing, selling for importation, and/or selling after importation into the United States the MLS Accused Products. The MLS Accused Products satisfy all claim limitations of claims 11, 14, and 16 of the '483 Patent at the time of importation into the United States.

266. Moreover, on information and belief, one or more of the MLS Respondents knowingly and intentionally induces infringement of the '483 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import MLS Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the MLS Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the MLS Respondents sells the MLS Accused Products or otherwise provides the MLS Accused Products to distributors knowing that these distributors intend to import and/or sell the MLS Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the MLS Respondents have had knowledge of,

or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the MLS Accused Products.

267. A claim chart comparing claims 11, 14, and 16 of the '483 Patent to an MLS Accused Product, the Sylvania LEDVANCE Garage LED Luminaire (GARAG1A/055UNVD740/G5-SV-D), is attached here as Confidential Exhibit 57C. The Sylvania LEDVANCE Garage LED Luminaire (GARAG1A/055UNVD740/G5-SV-D) is also submitted with this Complaint as Physical Exhibit P18.

268. Additionally, on information and belief, including based on teardown analyses and imaging, at least the following additional products constitute MLS Accused Products that infringe the '483 Patent for the reasons set forth above:

- Sylvania Smart+ ZigBee Adjustable White and Full Color 10W (60W Equivalent) A19 LED Light Bulb (73693)

**b. Infringement of the '053 Patent**

269. On information and belief, the MLS Respondents import, sell for importation, and/or sell after importation into the United States certain MLS Accused Products, which include LEDVANCE, LLC products and certain products sold under the Sylvania and Osram brand names, that infringe the '053 Patent.

270. The MLS Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 7, 11, 14, 22, 26, and 29 of the '053 Patent, in violation of 35 U.S.C. §271(a). The MLS Respondents directly infringe at least these claims by importing, selling for importation, and/or selling after importation into the United States the MLS Accused Products. The MLS Accused Products satisfy all claim limitations of claims 7, 11, 14, 22, 26, and 29 of the '053 Patent at the time of importation into the United States.

271. Moreover, on information and belief, one or more of the MLS Respondents knowingly and intentionally induces infringement of the '053 Patent in violation of 35 U.S.C. §



271(b) by actively encouraging others to offer to sell, sell, use, and/or import MLS Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the MLS Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the MLS Respondents sells the MLS Accused Products or otherwise provides the MLS Accused Products to distributors knowing that these distributors intend to import and/or sell the MLS Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the MLS Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the MLS Accused Products.

272. A claim chart comparing claims 7, 11, 14, 22, 26, and 29 of the '053 Patent to a representative MLS Accused Product, the Sylvania LEDVANCE Garage LED Luminaire (GARAG1A/055UNVD740/G5/SV/D), is attached here as Confidential Exhibit 58C. The Sylvania LEDVANCE Garage LED Luminaire (GARAG1A/055UNVD740/G5-SV-D) is also submitted with this Complaint as Physical Exhibit P18.

273. Additionally, on information and belief, including based on teardown analyses and imaging, at least the following additional products constitute MLS Accused Products that infringe the '053 Patent for the reasons set forth above:

- Sylvania Smart+ ZigBee Adjustable White and Full Color 10W (60W Equivalent) A19 LED Light Bulb (73693)

**c. Infringement of the '421 Patent**

274. On information and belief, the MLS Respondents import, sell for importation, and/or sell after importation into the United States certain MLS Accused Products that infringe the '421 Patent, including LEDVANCE, LLC products and certain products sold under the Sylvania and Osram brand names.

275. The MLS Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 1-2 and 6-7, 10 of the '421 Patent, in violation of 35 U.S.C. §271(a). The MLS Respondents directly infringe at least these claims by importing, selling for importation, and/or selling after importation into the United States the MLS Accused Products. The MLS Accused Products satisfy all claim limitations of claims 1-2 and 6-7, 10 of the '421 Patent at the time of importation into the United States.

276. Moreover, on information and belief, one or more of the MLS Respondents knowingly and intentionally induces infringement of the '421 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import MLS Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the MLS Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the MLS Respondents sells the MLS Accused Products or otherwise provides the MLS Accused Products to distributors knowing that these distributors intend to import and/or sell the MLS Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the MLS Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the MLS Accused Products.

277. A claim chart comparing claims 1-2 and 6-7, 10 of the '421 Patent to a representative MLS Accused Product, the Sylvania 8.5W (60W Replacement) Non-Dimmable A19 LED Light Bulb (Daylight) (LED8.5A19/F/850/10YV/RP2NJ), is attached here as Confidential Exhibit 59C. The Sylvania 8.5W (60W Replacement) Non-Dimmable A19 LED Light Bulb (Daylight) (LED8.5A19/F/850/10YV/RP2NJ) is also submitted with this Complaint as Physical Exhibit P19.

278. Additionally, on information and belief, including based on teardown analyses and imaging, at least the following additional products constitute MLS Accused Products that infringe the '421 Patent for the reasons set forth above:

- Sylvania SMART+ Bluetooth 10W (65W Equivalent) Full Color A19 LED Light Bulb (74484)
- Sylvania 14W (100W Replacement) Non-Dimmable A19 LED Light Bulb (Soft White) (LED14A19/F/827/10YV/RP4/1K)
- Sylvania 9W (60W Replacement) Dimmable A19 LED Light Bulb (Bright White) (LED9A19/DIM/0/835/U/RP4/XX)
- Sylvania 14W (100W Replacement) Non-Dimmable A19 LED Light Bulb (Daylight) (LED14A19/F/850/10YV/RP4/1K)
- Sylvania 9W (65W Replacement) Dimmable BR30 LED Light Bulb (Daylight) (LED9BR30/DIM/850/10YV/RP2)
- Sylvania 8.5W (60W Replacement) Non-Dimmable A19 LED Light Bulb (Soft White) (LED8.5A19/F/827/10YV/RP2/NJ)
- Sylvania 13W (85W Replacement) Dimmable BR40 Flood LED Light Bulb (Soft White) (LED13BR40/DIM/827/10YV/B2/ZS)
- Sylvania 6W (50W Replacement) Non-Dimmable PAR20 Flood LED Light Bulb (LED6PAR20/830/FL45/10YV/RP2)
- Sylvania 14W (100W Replacement) Non-Dimmable A19 LED Light Bulb (Soft White) (79292LED14/A19/F/827/10YV/RP)
- Sylvania Ultra 6W (40W Replacement) Dimmable A19 LED Light Bulb (Daylight) (LED6A19/DIM/0/850/G5/3F)
- Sylvania Smart+ Bluetooth 10W (65W Equivalent) BR30 LED Light Bulb (74988)
- Sylvania Smart+ ZigBee Adjustable White and Full Color 10W (60W Equivalent) A19 LED Light Bulb (73693)
- Sylvania 8.5W (60W Replacement) Non-Dimmable A19 LED Light Bulb (Soft White) (LED/8.5A19/F/827/10YV/RP24)

**d. Infringement of the '118 Patent**

279. On information and belief, the MLS Respondents import, sell for importation, and/or sell after importation into the United States certain MLS Accused Products, which include LEDVANCE, LLC products and certain products sold under the Sylvania and Osram brand names, that infringe the '118 Patent.

280. The MLS Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 2, 5, 10, 12, 14-15, and 17-18 of the '118 Patent, in violation of 35

U.S.C. § 271(a). The MLS Respondents directly infringe at least these claims by importing, selling for importation, and/or selling after importation into the United States the MLS Accused Products. The MLS Accused Products satisfy all claim limitations of claims 1, 2, 5, 10, 12, 14-15, and 17-18 of the '118 Patent at the time of importation into the United States.

281. Moreover, on information and belief, one or more of the MLS Respondents knowingly and intentionally induces infringement of the '118 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import MLS Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the MLS Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the MLS Respondents sells the MLS Accused Products or otherwise provides the MLS Accused Products to distributors knowing that these distributors intend to import and/or sell the MLS Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the MLS Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the MLS Accused Products.

282. A claim chart comparing claims 1, 2, 5, 10, 12, 14-15, and 17-18 of the '118 Patent to a representative MLS Accused Product, the Sylvania LEDVANCE Garage LED Luminaire (GARAG1A/055UNVD740/G5/SV/D), is attached here as Confidential Exhibit 60C. The Sylvania LEDVANCE Garage LED Luminaire (GARAG1A/055UNVD740/G5/SV/D) is also submitted with this Complaint as Physical Exhibit P18.

**e. Infringement of the '608 Patent**

283. On information and belief, the MLS Respondents import, sell for importation, and/or sell after importation into the United States certain MLS Accused Products, which include

LEDVANCE, LLC products and certain products sold under the Sylvania and Osram brand names, that infringe the '608 Patent.

284. The MLS Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 20-22, 24, 28, and 37 of the '608 Patent, in violation of 35 U.S.C. § 271(a). The MLS Respondents directly infringe at least these claims by importing, selling for importation, and/or selling after importation into the United States the MLS Accused Products. The MLS Accused Products satisfy all claim limitations of claims 20-22, 24, 28, and 37 of the '608 Patent at the time of importation into the United States.

285. Moreover, on information and belief, one or more of the MLS Respondents knowingly and intentionally induces infringement of the '608 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import MLS Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the MLS Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the MLS Respondents sells the MLS Accused Products or otherwise provides the MLS Accused Products to distributors knowing that these distributors intend to import and/or sell the MLS Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the MLS Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the MLS Accused Products.

286. A claim chart comparing claims 20-22, 24, 28, and 37 of the '608 Patent to a representative MLS Accused Product, the Sylvania Smart+ System, as defined in the corresponding claim chart, which is attached here as Exhibit 61C. Certain products designed and

sold to be used in conjunction with the Sylvania Smart+ System, which are charted in Complainants' claim chart, are also submitted with this Complaint as Physical Exhibits P20-P25.

**G. GE Respondents**

**1. Patent Infringement**

**a. Infringement of the '483 Patent**

287. On information and belief, the GE Respondents import, sell for importation, and/or sell after importation into the United States certain Accused Products (the "GE Accused Products") that infringe the '483 Patent.

288. The GE Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 11 and 16 of the '483 Patent, in violation of 35 U.S.C. § 271(a). The GE Respondents directly infringe at least these claims by importing, selling for importation, and/or selling after importation into the United States the GE Accused Products. The GE Accused Products satisfy all claim limitations of claims 11 and 16 of the '483 Patent at the time of importation into the United States.

289. Moreover, on information and belief, one or more of the GE Respondents knowingly and intentionally induces infringement of the '483 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import GE Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the GE Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the GE Respondents sells the GE Accused Products or otherwise provides the GE Accused Products to distributors knowing that these distributors intend to import and/or sell the GE Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the GE Respondents have had knowledge of, or have been

willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the GE Accused Products.

290. A claim chart comparing claims 11 and 16 of the '483 Patent to a representative GE Accused Product, the GE Infusion™ LED Module (M1000/830/W/N), is attached here as Confidential Exhibit 62C. The GE Infusion™ LED Module (M1000/830/W/N) is also submitted with this Complaint as Physical Exhibit P26.

291. Additionally, on information and belief, including based on teardown analyses and imaging, at least the following additional products constitute GE Accused Products that infringe the '483 Patent for the reasons set forth above:

- GE Infusion™ LED Module (M1000/827/W/G4)
- GE Infusion™ LED Module (M1000/830/W/G4)

**b. Infringement of the '053 Patent**

292. On information and belief, the GE Respondents import, sell for importation, and/or sell after importation into the United States certain GE Accused Products that infringe the '053 Patent.

293. The GE Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 7, 11, 13-14, 22, 26, and 28-29 of the '053 Patent, in violation of 35 U.S.C. § 271(a). The GE Respondents directly infringe at least these claims by importing, selling for importation, and/or selling after importation into the United States the GE Accused Products. The GE Accused Products satisfy all claim limitations of claims 7, 11, 13-14, 22, 26, and 28-29 of the '053 Patent at the time of importation into the United States.

294. Moreover, on information and belief, one or more of the GE Respondents knowingly and intentionally induces infringement of the '053 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import GE Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information

and belief, with knowledge and intent, or with willful blindness, one or more of the GE Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the GE Respondents sells the GE Accused Products or otherwise provides the GE Accused Products to distributors knowing that these distributors intend to import and/or sell the GE Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the GE Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the GE Accused Products.

295. A claim chart comparing claims 7, 11, 13-14, 22, 26, and 28-29 of the '053 Patent to a representative GE Accused Product, the GE Infusion™ LED Module (M1000/830/W/N), is attached here as Confidential Exhibit 63C. The GE Infusion™ LED Module (M1000/830/W/N) is also submitted with this Complaint as Physical Exhibit P26.

296. Additionally, on information and belief, including based on teardown analyses and imaging, at least the following additional products constitute GE Accused Products that infringe the '053 Patent for the reasons set forth above:

- GE Infusion™ LED Module (M1000/827/W/G4)
- GE Infusion™ LED Module (M1000/830/W/G4)

**c. Infringement of the '421 Patent**

297. On information and belief, the GE Respondents import, sell for importation, and/or sell after importation into the United States certain GE Accused Products that infringe the '421 Patent.

298. The GE Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 1-2, 6-7, and 10 of the '421 Patent, in violation of 35 U.S.C. §271(a). The GE Respondents directly infringe at least these claims by importing, selling for importation, and/or selling after importation into the United States the GE Accused Products. The GE Accused



Products satisfy all claim limitations of claims 1-2, 6-7, and 10 of the '421 Patent at the time of importation into the United States.

299. Moreover, on information and belief, one or more of the GE Respondents knowingly and intentionally induces infringement of the '421 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import GE Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the GE Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the GE Respondents sells the GE Accused Products or otherwise provides the GE Accused Products to distributors knowing that these distributors intend to import and/or sell the GE Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the GE Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the GE Accused Products.

300. A claim chart comparing claims 1-2, 6-7, and 10 of the '421 Patent to a representative Accused Product, the GE Refresh 10.5W (60W Replacement) Dimmable A19 HD LED Light Bulb (Daylight) (28003), is attached here as Confidential Exhibit 64C. The GE Refresh 10.5W (60W Replacement) Dimmable A19 HD LED Light Bulb (Daylight) (28003) is also submitted with this Complaint as Physical Exhibit P27.

301. Additionally, on information and belief, including based on teardown analyses and imaging, at least the following additional products constitute GE Accused Products that infringe the '421 Patent for the reasons set forth above:

- GE C-Sleep™ 11W Dimmable A19 Smart LED Light Bulb (LED11DA19/CSLP 2000-7000K)

- GE 9W (60W Replacement) Non-Dimmable A19 LED Light Bulb (Soft White) (92879)
- GE Refresh 10.5W (60W Replacement) Dimmable A19 HD LED Light Bulb (Daylight) (28003)
- GE 6W (40W Replacement) Dimmable A19 LED Light Bulb (Soft White) (67607)
- GE Bright Stik™ 15W (100W Replacement) Non-Dimmable LED Light Bulb (Soft White) (63857)
- GE Relax 8W (65W Replacement) Dimmable BR30 HD LED Light Bulb (Soft White) (43073)
- GE 10W (60W Replacement) Dimmable A19 LED Light Bulb (Soft White) (32943)
- GE 4W (40W Replacement) Dimmable A15 LED Light Bulb (Daylight) (36776)
- GE 10W (65W Replacement) Dimmable BR30 LED Light Bulb (Soft White) (41308)
- GE 13W (85W Replacement) Dimmable BR40 Flood LED Light Bulb (Soft White) (92171)
- GE Classic 15W (100W Replacement) Dimmable A21 LED Light Bulb (Daylight) (33076)
- GE Basic 8.5W (60W Replacement) Non-Dimmable A19 LED Light Bulb (Daylight) (46244)
- GE Basic 8.5W (60W Replacement) Non-Dimmable A19 LED Light Bulb (Soft White) (46241)
- GE Relax 8.5W (60W Replacement) Dimmable A19 LED Light Bulb (Soft White) (44930)
- GE Basic 20W (150W Replacement) Non-Dimmable A21 LED Light Bulb (Soft White) (46245)
- GE Classic 10W (60W Replacement) Dimmable A21 LED Light Bulb (Daylight) (44781)
- GE Refresh 17W (100W Replacement) Dimmable A21 HD LED Light Bulb (Daylight) (46326)
- GE Classic 15W (100W Replacement) Dimmable A21 HD LED Light Bulb (Soft White) (33071)
- GE Classic 8W (60W Replacement) Dimmable A19 LED Light Bulb (Daylight) (44923)
- GE Refresh 8.5W (60W Replacement) Dimmable A19 LED Light Bulb (Daylight) (44937)
- GE 10W (65W Replacement) Dimmable BR30 Flood LED Light Bulb (Soft White) (40925)
- GE Relax 17W (100W Replacement) Dimmable A21 HD LED Light Bulb (Soft White) (44148)
- GE Reveal® 10.5W (60W Replacement) Dimmable LED Light Bulb (39101)
- C by GE, C-Life 11W A19 Smart LED Light Bulb (44298)
- GE 18W (90W Replacement) Dimmable PAR38 Floodlight LED Light Bulb (Bright White) (89992)

- GE 7W (50W Replacement) Dimmable MR16 Floodlight LED Light Bulb (Bright White) (45639)
- GE 10W (60W Replacement) LED A19 (Warm White) (92492)

**d. Infringement of the '118 Patent**

302. On information and belief, the GE Respondents import, sell for importation, and/or sell after importation into the United States certain GE Accused Products that infringe the '118 Patent.

303. The GE Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 5, and 15 of the '118 Patent, in violation of 35 U.S.C. §271(a). The GE Respondents directly infringe at least these claims by importing, selling for importation, and/or selling after importation into the United States the GE Accused Products. The GE Accused Products satisfy all claim limitations of claims 1, 5, and 15 of the '118 Patent at the time of importation into the United States.

304. Moreover, on information and belief, one or more of the GE Respondents knowingly and intentionally induces infringement of the '118 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import GE Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the GE Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the GE Respondents sells the GE Accused Products or otherwise provides the GE Accused Products to distributors knowing that these distributors intend to import and/or sell the GE Accused Products in the United States. On information and belief, as of the filing of this Complaint or earlier, the GE Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the GE Accused Products.

305. A claim chart comparing claims 1 and 5 of the '118 Patent to a representative GE Accused Product, the GE Relax 8W (65W Replacement) Dimmable BR30 HD LED Light Bulb (Soft White) (43073) is attached here as Confidential Exhibit 65C. The GE Relax 8W (65W Replacement) Dimmable BR30 HD LED Light Bulb (Soft White) (43073) is also submitted with this Complaint as Physical Exhibit P28.

**e. Infringement of the '608 Patent**

306. On information and belief, the GE Respondents import, sell for importation, and/or sell after importation into the United States certain GE Accused Products that infringe the '608 Patent.

307. The GE Accused Products directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 2, 6, 12-13, 16, 19, 20-22, 24, 28, and 37 of the '608 Patent, in violation of 35 U.S.C. § 271(a). The GE Respondents directly infringe at least these claims by importing, selling for importation, and/or selling after importation into the United States the GE Accused Products. The GE Accused Products satisfy all claim limitations of claims 1, 2, 6, 12-13, 16, 19, 20-22, 24, 28, and 37 of the '608 Patent at the time of importation into the United States.

308. Moreover, on information and belief, one or more of the GE Respondents knowingly and intentionally induces infringement of the '608 Patent in violation of 35 U.S.C. § 271(b) by actively encouraging others to offer to sell, sell, use, and/or import GE Accused Products into the United States (i.e., by actively encouraging others to directly infringe). On information and belief, with knowledge and intent, or with willful blindness, one or more of the GE Respondents is encouraging and facilitating infringement by others. For example, on information and belief, one or more of the GE Respondents sells the GE Accused Products or otherwise provides the GE Accused Products to distributors knowing that these distributors intend to import and/or sell the GE Accused Products in the United States. On information and belief, as of the

filing of this Complaint or earlier, the GE Respondents have had knowledge of, or have been willfully blind toward, the Asserted Patents and the infringement of the Asserted Patents by making, using, selling, offering to sell, and/or importing the GE Accused Products.

309. A claim chart comparing claims 1, 2, 6, 12-13, 16, 19, 20-22, 24, 28, and 37 of the '608 Patent to a GE Accused Product, the C by GE System, as defined in the corresponding claim chart, which is attached here as Confidential Exhibit 67C. Certain products designed and sold to be used in conjunction with the C by GE System, which are charted in Complainants' claim chart, are also submitted with this Complaint as Physical Exhibits P29-P30.

## **2. False and Misleading Advertising**

310. GE Respondents advertise their products, including at least the GE 11W (60W Replacement) Dimmable A19 LED Light Bulb (Soft White) (25037) ("GE 25037 LED A19 Bulb") and the GE 10W (60W Replacement) Dimmable A19 LED Light Bulb (Soft White) (67591) ("GE 67591 LED A19 Bulb"), as being Energy Star certified by including the Energy Star® logo on their packaging. *See* Ex. 31 (Maxik Energy Star Decl.) ¶¶ 9, 14.

311. LSG tested the GE 25037 LED A19 Bulb for compliance with Sections 9.2 and 9.6 of the ENERGY STAR® Program Requirements Product Specification for Lamps (Light Bulbs) Version 2.1<sup>87</sup> at its facility in Cocoa Beach, Florida. *Id.* ¶¶ 2, 8. Even though the bulb's packaging displays the Energy Star® logo, it failed to meet the requirements of either Section 9.2 or 9.6 of the ENERGY STAR® Program Requirements. *Id.* ¶¶ 9-11.

312. Ten of the fourteen tested bulbs emitted less than the 800 lumens of light required by Section 9.2 for a 60-watt equivalent bulb, and the average light level was below the 800-lumen

---

<sup>87</sup> Ex. 31 (Maxik Energy Star Decl., Ex. A ("ENERGY STAR® Program Requirements for Lamps (Light Bulbs), Eligibility Criteria, Version 2.1").

average required by the Specification. *Id.* ¶ 11. Each of these failures independently prevents the GE 25037 LED A19 Bulb from meeting the requirements of Section 9.2.

313. In addition, the GE 25037 LED A19 Bulbs failed to meet Section 9.6's requirement that at least nine out of ten bulbs emit light within the ANSI range corresponding to the advertised color temperature of 2700K. *Id.* ¶ 12. At least three of the fourteen tested bulbs fell outside the ANSI range corresponding to the advertised color temperature. *Id.* Accordingly, the bulbs also fail to meet the correlated color temperature requirements of Section 9.6. *Id.*

314. LSG also tested the GE 67591 LED A19 Bulb for compliance with Section 9.2 of the ENERGY STAR® Program Requirements Product Specification for Lamps (Light Bulbs) Version 2.1 at its facility in Cocoa Beach, Florida. *Id.* ¶¶ 2, 15. Even though the bulb's packaging displays the Energy Star® logo, it failed to meet the requirements of Section 9.2 of the ENERGY STAR® Program Requirements. *Id.* ¶¶ 14, 16.

315. All ten of the tested bulbs emitted less than the 800 lumens of light required by Section 9.2 for a 60-watt equivalent bulb, and the average light level was below the 800-lumen average required by the Specification. *Id.* ¶ 16. Each of these failures independently prevents the GE 67591 LED A19 Bulb from meeting the requirements of Section 9.2.

316. As these failures show, at least GE Respondents' GE 25037 LED A19 Bulbs and GE 67591 LED A19 Bulbs mislead consumers because the bulbs will be dimmer than advertised and will emit a different color of light than advertised. GE Respondents' GE 25037 LED A19 and GE 67591 LED A19 Bulbs will thus fail to meet the expectations of consumers who have grown to rely on the Energy Star® logo as a signal of reliability and quality.<sup>88</sup>

---

<sup>88</sup> The specific falsely advertised GE products identified in this Complaint are exemplary, and not limiting. Complainants anticipate that discovery will establish the full scope of GE Respondents' false advertising with respect to the Energy Star certification of their products.