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*Attorneys for Defendant
Signify North America Corporation and
Signify Holding B.V.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SIGNIFY NORTH AMERICA
CORPORATION and
SIGNIFY HOLDING B.V.

Plaintiffs,

v.

ALL STAR LIGHTING SUPPLIES, INC.,

Defendant.

CASE NO. 22-cv-3150

DEMAND FOR JURY TRIAL

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs Signify North America Corporation and Signify Holding B.V. (collectively, “Signify”) for their complaint against Defendant All Star Lighting Supplies, Inc. (“Defendant”)

allege as follows:

NATURE OF THE ACTION

1. This is a civil action for patent infringement arising under the patent laws of the United States, 35 U.S.C. § 1 *et seq.* including 35 U.S.C. § 271, which gives rise to the remedies specified under 35 U.S.C. §§ 281 and 283-285.

THE PARTIES

2. Plaintiff Signify North America Corporation is a corporation organized and existing under the laws of Delaware with a place of business at 200 Franklin Square Drive, Somerset, New Jersey 08873.

3. Plaintiff Signify Holding B.V. is a corporation organized and existing under the laws of the Netherlands with its registered office at High Tech Campus 48, 5656 AE Eindhoven, The Netherlands.

4. On information and belief, Defendant All Star Lighting Supplies, Inc. is a corporation organized and existing under the laws of New Jersey with a place of business at 33 Randolph Avenue, Avenel, New Jersey, 07001.

JURISDICTION AND VENUE

5. This Court has subject-matter jurisdiction over this patent infringement action pursuant to 28 U.S.C. §§ 1331 and 1338.

6. This Court has personal jurisdiction over Defendant, on information and belief, for at least the following reasons: (i) Defendant has committed acts of patent infringement in this District; (ii) Defendant regularly conducts business, solicits business, and/or derives substantial revenue from products provided within this District, including products that infringe Signify's patented technology; and (iii) Defendant has a place of business within this District at 33 Randolph Avenue, Avenel, New Jersey, 07001.

7. Venue properly lies in this District. Pursuant to 28 U.S.C. § 1400, on information and belief, Defendant has committed acts of patent infringement in this District and has a regular and established place of business in this District at 33 Randolph Avenue, Avenel, New Jersey, 07001.

THE PATENTS-IN-SUIT

8. Signify is a global market leader with recognized expertise in the development, manufacturing, and application of innovative LED lighting solutions. Signify's LED lighting products have been installed and utilized throughout the world, for example, on the Empire State Building (<https://www.signify.com/en-us/our-company/news/press-release-archive/2012/20121127-empire-state-building>).



9. To protect its innovations resulting from its significant investments, Signify applied for and obtained numerous patents directed to various LED inventions and technologies. For

example, Signify's LED-related patents include U.S. Patent Nos. 7,038,399, 7,255,457, 7,256,554, 8,070,328, 8,348,479, and 9,709,253 (collectively, the "Patents-in-Suit").

10. U.S. Patent No. 7,038,399 ("the '399 Patent"), titled "Methods and apparatus for providing power to lighting devices," was duly and legally issued by the United States Patent and Trademark Office on May 2, 2006. Plaintiff Signify North America Corporation is the assignee and owner of all right, title, and interest in the '399 Patent, attached as Exhibit 1.

11. U.S. Patent No. 7,255,457 ("the '457 Patent"), titled "Methods and apparatus for generating and modulating illumination conditions," was duly and legally issued by the United States Patent and Trademark Office on August 14, 2007. Plaintiff Signify North America Corporation is the assignee and owner of all right, title, and interest in the '457 Patent, attached as Exhibit 2.

12. U.S. Patent No. 7,256,554 ("the '554 Patent"), titled "LED power control methods and apparatus," was duly and legally issued by the United States Patent and Trademark Office on August 14, 2007. Plaintiff Signify North America Corporation is the assignee and owner of all right, title, and interest in the '554 Patent, attached as Exhibit 3.

13. U.S. Patent No. 8,070,328 ("the '328 Patent"), titled "LED downlight," was duly and legally issued by the United States Patent and Trademark Office on December 6, 2011. Plaintiff Signify Holding B.V. is the assignee and owner of all right, title, and interest in the '328 Patent, attached as Exhibit 4.

14. U.S. Patent 8,348,479 ("the '479 Patent"), titled "Light emitting diode recessed light fixture," was duly and legally issued by the United States Patent and Trademark Office on January 8, 2013. Plaintiff Signify Holding B.V. is the assignee and owner of all right, title, and interest in the '479 Patent, attached as Exhibit 5.

15. U.S. Patent No. 9,709,253 (“the ’253 Patent”), titled “Light emitting diode recessed light fixture,” was duly and legally issued by the United States Patent and Trademark Office on July 18, 2017. Plaintiff Signify Holding B.V. is the assignee and owner of all right, title, and interest in the ’253 Patent, attached as Exhibit 6.

COUNT ONE

INFRINGEMENT OF U.S. PATENT NO. 7,038,399

16. Signify incorporates by reference the allegations in paragraphs 1–15 as if fully set forth herein.

17. On information and belief, Defendant has infringed claims of the ’399 Patent, including at least claim 7, in violation of 35 U.S.C. § 271(a) by manufacturing, using, offering to sell, selling, and/or importing infringing products.

18. Claim 7 of the ’399 Patent recites:

An illumination apparatus, comprising:

at least one LED; and

at least one controller coupled to the at least one LED and configured to receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, the at least one controller further configured to provide power to the at least one LED based on the power-related signal,

wherein the A.C. power source is an A.C. dimmer circuit, wherein the A.C. dimmer circuit is controlled by a user interface to vary the power-related signal, and wherein the at least one controller is configured to variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, and wherein the operation of the user interface varies a duty cycle of the power-related signal, and wherein the at least one controller is configured to variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal.

19. On information and belief, Defendant has directly infringed claim 7 of the ’399 Patent by making, using, offering to sell, selling, and/or importing dimmable products, including

LR23171, LR23280, and LR24121 products, in this judicial district and elsewhere in the United States, prior to the expiration date of the '399 Patent. (For the purposes of this Complaint, products are identified by the product model number provided on Defendant's website.)

Infringing LR23171 products

20. On information and belief, LR23171 products are illumination apparatuses. An example of the LR23171 products is shown in the below image, taken from Defendant's Winter 2017 catalog, available at: www.allstarlighting.com/media/Luxrite-catalog-winter-17.pdf.

Defendant provides a non-exclusive list of dimmers compatible with LR23171 products at: www.allstarlighting.com/media/catalog/product/l/r/COMPATIBLE%20LIST-%20LED%20CHROME%20V2.pdf.



21. On information and belief, LR23171 products include at least one LED; for example, LR23171 products include multiple LEDs.



22. On information and belief, LR23171 products include at least one controller coupled to the at least one LED and configured to receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, the at least one controller further configured to provide power to the at least one LED based on the power-related signal; for example, LR23171 products include a controller that is configured to receive a phase-cut A.C. signal, *e.g.*, from a TRIAC dimmer, and to provide power to the LEDs based on the phase-cut signal.



23. On information and belief, the A.C. power source is an A.C. dimmer circuit, wherein the A.C. dimmer circuit is controlled by a user interface to vary the power-related signal, and wherein the at least one controller is configured to variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, and wherein the operation of the user interface varies a duty cycle of the power-related signal, and wherein the at least one controller is configured to variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal; for example, LR23171 products are compatible with an A.C. dimmer circuit (*e.g.*, TRIAC dimmer) that varies the duty cycle of the phase cut signal in response to a user adjusting a user interface, the controller variably controlling

the intensity of the light emitted by the LEDs in response to the change in duty cycle of the phase cut signal. (For example, the list of compatible dimmers provided by Defendant, a portion of which is excerpted below, identifies the Leviton 6683, which is a TRIAC dimmer. The face of the controller, as shown above, further identifies itself as “TRIAC DIMMING TYPE” and providing “TRIAC DIMMING: 0-100%* to max”)

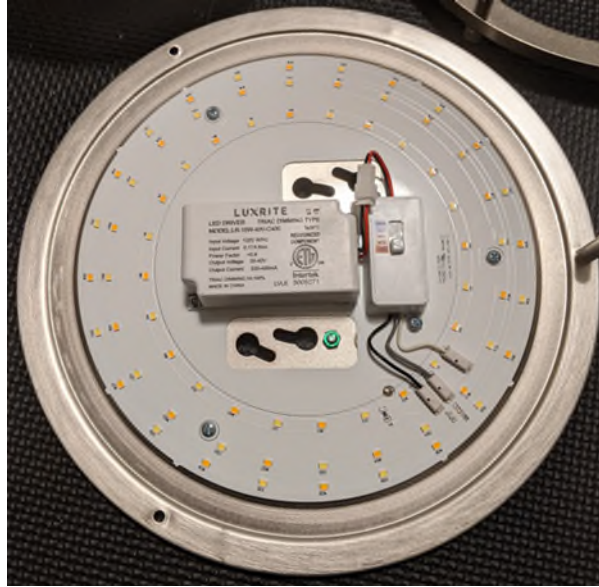
Leviton
IP106
6613-P
6633-P
6683
6684
NELV-450

Infringing LR23280 products

24. On information and belief, LR23280 products are illumination apparatuses. An example of the LR23280 products is shown in the below image, taken from Defendant’s website at www.allstarlighting.com/lr23280.html. Defendant provides a non-exclusive list of dimmers compatible with LR products at: www.allstarlighting.com/media/catalog/product/c/c/cctchrome-dimmercompatibility.pdf.



25. On information and belief, LR23280 products include at least one LED; for example, LR23280 products include multiple LEDs.



26. On information and belief, LR23280 products include at least one controller coupled to the at least one LED and configured to receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, the at least one controller further configured to provide power to the at least one LED based on the power-related signal; for example, LR23280 products include a controller that is configured to receive a phase-cut A.C. signal, *e.g.*, from a TRIAC dimmer, and to provide power to the LEDs based on the phase-cut signal.



27. On information and belief, the A.C. power source is an A.C. dimmer circuit, wherein the A.C. dimmer circuit is controlled by a user interface to vary the power-related signal,

and wherein the at least one controller is configured to variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, and wherein the operation of the user interface varies a duty cycle of the power-related signal, and wherein the at least one controller is configured to variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal; for example, LR23280 products are compatible with an A.C. dimmer circuit (e.g., TRIAC dimmer) that varies the duty cycle of the phase cut signal in response to a user adjusting a user interface, the controller variably controlling the intensity of the light emitted by the LEDs in response to the change in duty cycle of the phase cut signal. (For example, the list of compatible dimmers provided by Defendant, a portion of which is excerpted below, identifies the Leviton R62-06674-POW, which is a TRIAC dimmer. The face of the controller, as shown above, further identifies itself as “TRIAC DIMMING TYPE” and providing “TRIAC DIMMING: 0-100%.”).

LEVITON
R62-06674-POW
R12-06672-1LW
R50-IPL06-10M
SAL06P-LA-K

Infringing LR24121 products

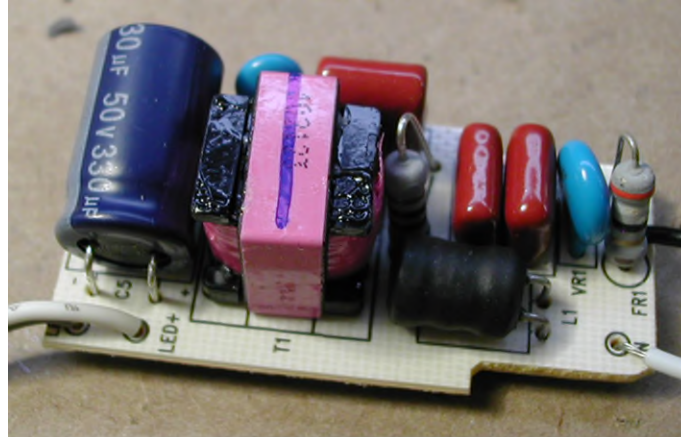
28. On information and belief, LR24121 products are illumination apparatuses. An example of the LR24121 products is shown in the below image, taken from Defendant’s Winter 2017 catalog, available at: www.allstarlighting.com/media/Luxrite-catalog-winter-17.pdf. Defendant provides a non-exclusive list of dimmers compatible with LR24121 products at: www.allstarlighting.com/media/catalog/product/l/r/COMPATIBLE%20LIST-%20LED%20PAR.pdf.



29. On information and belief, LR24121 products include at least one LED; for example, LR24121 products include multiple LEDs.



30. On information and belief, LR24121 products include at least one controller coupled to the at least one LED and configured to receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage, the at least one controller further configured to provide power to the at least one LED based on the power-related signal; for example, LR24121 products include a controller that is configured to receive a phase-cut A.C. signal, e.g., from a TRIAC dimmer, and to provide power to the LEDs based on the phase-cut signal.



31. On information and belief, the A.C. power source is an A.C. dimmer circuit, wherein the A.C. dimmer circuit is controlled by a user interface to vary the power-related signal, and wherein the at least one controller is configured to variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, and wherein the operation of the user interface varies a duty cycle of the power-related signal, and wherein the at least one controller is configured to variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal; for example, LR24121 products are compatible with an A.C. dimmer circuit (e.g., TRIAC dimmer) a TRIAC dimmer is an A.C. dimmer circuit that varies the duty cycle of the phase cut signal in response to a user adjusting a user interface, the controller variably controlling the intensity of the light emitted by the LEDs in response to the change in duty cycle of the phase cut signal. (For example, the list of compatible dimmers provided by Defendant, a portion of which is excerpted below, identifies the Leviton 6683, which is a TRIAC dimmer.)

Leviton
6631
6672
6674
6683
6684
6613-P
6633-P
IPI06

32. The full extent of Defendant's infringement is not presently known to Signify. On information and belief, Defendant has made and sold products under different names or part numbers that infringe the '399 Patent in a similar manner. Signify makes this preliminary identification of infringing products and infringed claims in Count One without the benefit of discovery or claim construction in this action, and expressly reserves the right to augment, supplement, and revise its identifications based on additional information obtained through discovery or otherwise.

33. Signify has suffered damages as a result of Defendant's infringement of the '399 Patent in an amount to be determined at trial.

34. On information and belief, Defendant has been aware of and has had notice and actual knowledge of the '399 Patent and its infringement of the '399 Patent since at least as early as June 2017. For example, Defendant was notified in a letter dated June 2, 2017 that Defendant's TRIAC dimmable products, including A-shape, flood, PAR, downlight retrofit, and LED surface mount products, infringed the '399 Patent. That letter serves as actual notice for the respective product(s) and for all substantially similar products.

35. On information and belief, LR23171, LR23280, and LR24121 products are dimmable products compatible with phase-cut (e.g., TRIAC) dimmers and are the same or substantially similar to the products noticed in the June 2, 2017 letter and thus Defendant was on actual notice of infringement for these products by June 2, 2017, or, if later, the date these products were first made, used, sold, offered for sale, or imported.

36. Signify additionally makes an identification of the following products (by model number) as appearing to be substantially similar to LR23171, LR23280, and/or LR24121 products: LR23790, LR23791, LR23796, LR23788, LR23789, LR24846, LR24876, LR25115, LR25129,

LR25132, LR25133, LR25135, LR25136, LR25137, LR25161, LR25163, LR25165, LR25167, LR24877, LR24882, LR24847, LR24878, LR24848, LR24879, LR24884, LR21500, LR21257, LR21265, LR21275, LR21280, LR21350, LR21400, LR21404, LR21420, LR21425, LR21430, LR21440, LR21445, LR21450, LR21460, LR21552, LR21553, LR21562, LR21563, LR21572, LR21573, LR21582, LR21592, LR21593, LR21602, LR21610, LR21612, LR21616, LR21619, LR21622, LR21623, LR21625, LR23712, LR23713, LR24640, LR24802, LR24812, LR24830, LR24835, LR24845, LR24870, LR24875, LR24880, LR24885, LR31500, LR31600, LR31605, LR31615, LR31820, LR31840, LR31850, LR23718, LR23719, LR24825, LR23281, LR23282, LR23283, LR23284, LR23410, LR23750, LR23753, LR23755, LR23758, LR23760, LR23763, LR23784, LR23795, LR23751, LR23754, LR23756, LR23759, LR23761, LR23764, LR24950, LR24960, LR32180, LR32181, LR32183, LR32184, LR32185, LR32186, LR21276, LR21281, LR21351, LR21401, LR21405, LR21421, LR21426, LR21431, LR21441, LR21446, LR21451, LR21461, LR21501, LR21574, LR21575, LR21594, LR21595, LR21613, LR23007, LR23040 , LR23150, LR23160, LR23170, LR23172, LR23174, LR23176, LR23178, LR23230, LR23237, LR23240, LR23247, LR23251, LR23271, LR23276, LR23400, LR23405, LR23600, LR23603, LR23606, LR23609, LR23612, LR23615, LR23618, LR23621, LR23624, LR23627, LR23630, LR23633, LR23650, LR23653, LR23656, LR23659, LR23662, LR23665, LR23670, LR23694, LR23697, LR23700, LR23703, LR23706, LR23709, LR23801, LR23811, LR23821, LR24641, LR24650, LR24805, LR24815, LR24826, LR24831, LR24836, LR24841, LR24851, LR24871, LR24881, LR24886, LR31501, LR31511, LR31516, LR31601, LR31606, LR31616, LR31821, LR31841, LR31851, LR32090, LR32095, LR23734, LR23736, LR23673, LR23831, LR23833, LR23835, LR23735, LR23737, LR23590, LR23591, LR23592, LR23593, LR23594, LR23595, LR23159, LR23168, LR23169, LR23246, LR23255, LR23265, LR23267, LR23950, LR23958,

LR23960, LR24887, LR24872, LR31602, LR31607, LR31617, LR31822, LR31842, LR31852, LR32091, LR32096, LR21402, LR21406, LR21502, LR24642, LR31503, LR31513, LR31518, LR21277, LR21282, LR21352, LR21422, LR21427, LR21432, LR21442, LR21447, LR21452, LR21462, LR21576, LR21577, LR21596, LR21597, LR23001, LR23155, LR23165, LR23173, LR23175, LR23177, LR23179, LR23189, LR23238, LR23253, LR23273, LR23278, LR23402, LR23407, LR23601, LR23604, LR23607, LR23610, LR23613, LR23616, LR23619, LR23622, LR23625, LR23628, LR23631, LR23634, LR23651, LR23654, LR23657, LR23660, LR23663, LR23666, LR23671, LR23695, LR23698, LR23701, LR23704, LR23707, LR23710, LR23803, LR23813, LR23823, LR24652, LR24807, LR24817, LR24828, LR24832, LR24837, LR24842, LR24852, LR24873, LR24883, LR24888, LR31603, LR31608, LR31618, LR31823, LR31843, LR31853, LR32092, LR32097, LR21278, LR21283, LR21353, LR21403, LR21407, LR21423, LR21428, LR21433, LR21443, LR21448, LR21453, LR21463, LR21503, LR21578, LR21579, LR21598, LR21599, LR21608, LR21611, LR21614, LR21620, LR23009, LR23045, LR23157, LR23167, LR23180, LR23181, LR23182, LR23183, LR23184, LR23235, LR23239, LR23245, LR23249, LR23254, LR23274, LR23279, LR23602, LR23605, LR23608, LR23611, LR23614, LR23617, LR23620, LR23623, LR23626, LR23629, LR23632, LR23635, LR23652, LR23655, LR23658, LR23661, LR23664, LR23667, LR23672, LR23696, LR23699, LR23702, LR23705, LR23804, LR23814, LR23824, LR24644, LR24655, LR24810, LR24820, LR24833, LR24838, LR24843, LR24853, LR24874, LR24889, LR31504, LR31514, LR31519, LR31604, LR31609, LR31619, LR31824, LR31844, LR31854, LR32093, LR32098, LR23708, LR23711, LR24829, LR31825, LR31845, LR31855, LR23785, LR21228, LR21227, LR21226, LR21019, LR21029, LR21039, LR21308, LR21309, LR21311, LR21310, LR21300, LR21301, LR21302, LR21303, LR21304, LR21305, LR21306, LR21307, LR23037, LR23039, LR23234, LR23250, LR24050,

LR24051, LR24052, LR24053, LR24054, LR24045, LR24046, LR24047, LR24048, LR24055, LR24056, LR24057, LR24058, LR24059, LR24120, LR24122, LR24123, LR24124, LR24130, LR24131, LR24132, LR24133, LR24134, LR24140, LR24141, LR24142, LR24143, LR24144, LR31800, LR31801, LR31802, LR31803, LR31804, LR31805, LR31810, LR31811, LR31812, LR31813, LR31814, LR31815, LR24500, LR24505, LR24510, LR24515.

37. Defendant's pre-suit knowledge of the '399 Patent and failure to substantively address Signify's numerous notifications of infringement are sufficient to support a plausible inference that Defendant's infringement was willful and egregious, warranting enhancement of damages under 35 U.S.C. § 284, and attorneys' fees and costs incurred under 35 U.S.C. § 285.

COUNT TWO

INFRINGEMENT OF U.S. PATENT NO. 7,255,457

38. Signify incorporates by reference the allegations in paragraphs 1–15 as if fully set forth herein.

39. On information and belief, Defendant has infringed the '457 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(a) by manufacturing, using, offering to sell, selling, and/or importing infringing products.

40. Claim 1 of the '457 Patent recites:

An apparatus for generating essentially white light, comprising:

at least one first white LED characterized by a first spectrum having a first color temperature, the at least one first white LED including a first phosphor, the at least one first white LED generating at least one first wavelength that is converted by the first phosphor to provide the first spectrum; and

at least one second white LED characterized by a second spectrum having a second color temperature, the at least one second white LED including a second phosphor, the at least one second white LED generating at least one second wavelength that is converted by the second phosphor to provide the second spectrum,

wherein; the first color temperature differs from the second color temperature by at least 2200 degrees Kelvin.

41. On information and belief, Defendant has directly infringed and is directly infringing, at least, claim 1 of the '457 Patent by making, using, offering to sell, selling, and/or importing its 5CCT line of products that allow color temperature selection of 2700 and 5000k, including at least Defendant's LR23280, LR23751, LR23785, LR23789, LR23791, LR23796, LR32180, and LR24025 products, in this judicial district and elsewhere in the United States, prior to expiration of the '457 Patent.

Infringing LR23280 Products

42. On information and belief, LR23280 products are apparatuses for generating essentially white light. LR23280 products are LED downlights that produce white light. An example of the LR23280 products is shown in the below image, taken from Defendant's website at www.allstarlighting.com/lr23280.html. Defendant provides a spec sheet for LR23280 products at: www.allstarlighting.com/media/catalog/product/c/c/cctchromespecsheet.pdf.



43. On information and belief, LR23280 products include at least one first white LED characterized by a first spectrum having a first color temperature, the at least one first white LED including a first phosphor, the at least one first white LED generating at least one first wavelength that is converted by the first phosphor to provide the first spectrum; for example, LR23280 products include a first white LED characterized by a first spectrum identified on the LR23280 spec sheet as having a color temperature of approximately 2700 K. The first white LED is a phosphor conversion LED that converts the light output of an LED die to the first spectrum.

44. On information and belief, LR23280 products include at least one second white LED characterized by a second spectrum having a second color temperature, the at least one second white LED including a second phosphor, the at least one second white LED generating at least one second wavelength that is converted by the second phosphor to provide the second spectrum; for example, LR23280 products include a second white LED characterized by a second spectrum identified on the LR23280 spec sheet as having a color temperature of approximately 5000 K. The second white LED is a phosphor conversion LED that converts the light output of an LED die to the second spectrum.



45. On information and belief, the first color temperature differs from the second color temperature by at least 2200 degrees Kelvin; for example, the first color temperature, 2700 K, differs from the second color temperature, 5000 K, by a value of 2300 K, which is greater than 2200 K.

Infringing LR23751 Products

46. On information and belief, LR23751 products are apparatuses for generating essentially white light. LR23751 products are LED downlights that produce white light. An

example of the LR23751 products is shown in the below image, taken from Defendant's website at www.allstarlighting.com/all-products/lr23751.html. Defendant provides a spec sheet for LR23751 products at: www.allstarlighting.com/media/catalog/product/l/r/lr23751655cctminipanelspecsheets_43.pdf.



47. On information and belief, LR23751 products include at least one first white LED characterized by a first spectrum having a first color temperature, the at least one first white LED including a first phosphor, the at least one first white LED generating at least one first wavelength that is converted by the first phosphor to provide the first spectrum; for example, LR23751 products include a first white LED characterized by a first spectrum identified on the LR23751 spec sheet as having a color temperature of approximately 2700 K. The first white LED is a phosphor conversion LED that converts the light output of an LED die to the first spectrum.

48. On information and belief, LR23751 products include at least one second white LED characterized by a second spectrum having a second color temperature, the at least one second white LED including a second phosphor, the at least one second white LED generating at least one second wavelength that is converted by the second phosphor to provide the second spectrum; for example, LR23751 products include a second white LED characterized by a second spectrum identified on the LR23751 spec sheet as having a color temperature of approximately 5000 K. The

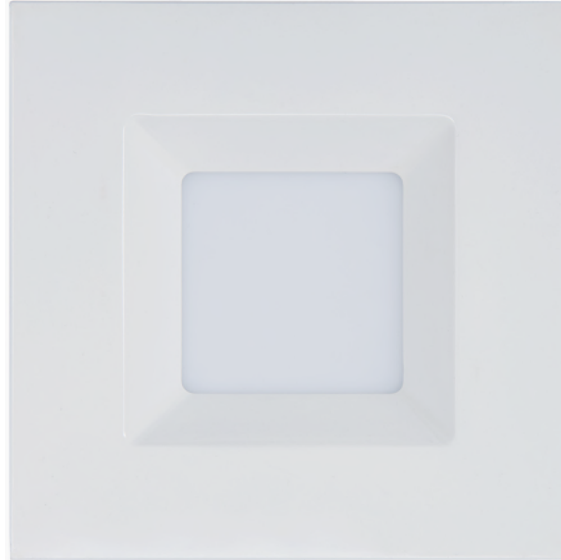
second white LED is a phosphor conversion LED that converts the light output of an LED die to the second spectrum.



49. On information and belief, the first color temperature differs from the second color temperature by at least 2200 degrees Kelvin; for example, the first color temperature, 2700 K, differs from the second color temperature, 5000 K, by a value of 2300 K, which is greater than 2200 K.

Infringing LR23785 Products

50. On information and belief, LR23785 products are apparatuses for generating essentially white light. LR23785 products are LED downlights that produce white light. An example of the LR23785 products is shown in the below image, taken from Defendant's website at www.allstarlighting.com/lr23785.html. Defendant provides a spec sheet for LR23785 products at: www.allstarlighting.com/media/catalog/product/l/r/lr23784-89cctdownlighsqtspecsheets_3.pdf.



51. On information and belief, LR23785 products include at least one first white LED characterized by a first spectrum having a first color temperature, the at least one first white LED including a first phosphor, the at least one first white LED generating at least one first wavelength that is converted by the first phosphor to provide the first spectrum; for example, LR23785 products include a first white LED characterized by a first spectrum identified on the LR23785 spec sheet as having a color temperature of approximately 2700 K. The first white LED is a phosphor conversion LED that converts the light output of an LED die to the first spectrum.

52. On information and belief, LR23785 products include at least one second white LED characterized by a second spectrum having a second color temperature, the at least one second white LED including a second phosphor, the at least one second white LED generating at least one second wavelength that is converted by the second phosphor to provide the second spectrum; for example, LR23785 products include a second white LED characterized by a second spectrum identified on the LR23785 spec sheet as having a color temperature of approximately 5000 K. The second white LED is a phosphor conversion LED that converts the light output of an LED die to the second spectrum.



53. On information and belief, the first color temperature differs from the second color temperature by at least 2200 degrees Kelvin; for example, the first color temperature, 2700 K, differs from the second color temperature, 5000 K, by a value of 2300 K, which is greater than 2200 K.

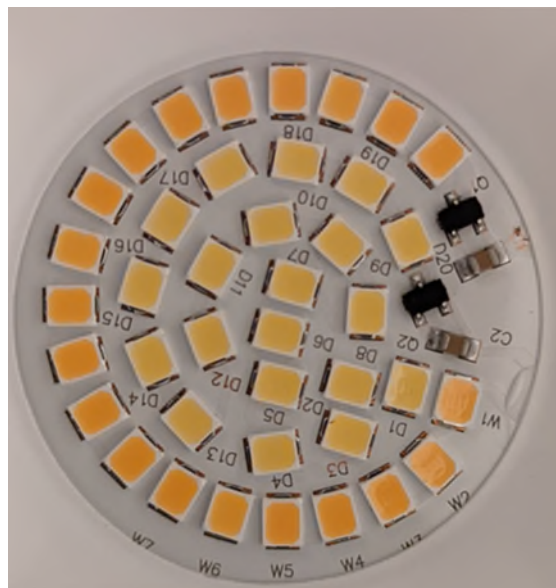
Infringing LR23789 Products

54. On information and belief, LR23789 products are apparatuses for generating essentially white light. LR23789 products are LED downlights that produce white light. An example of the LR23789 products is shown in the below image, taken from Defendant's website at www.allstarlighting.com/lr23789.html. Defendant provides a spec sheet for LR23789 products at: www.allstarlighting.com/media/catalog/product/l/r/lr23784-89cctdownlighsqtspecsheetsheet_1.pdf.



55. On information and belief, LR23789 products include at least one first white LED characterized by a first spectrum having a first color temperature, the at least one first white LED including a first phosphor, the at least one first white LED generating at least one first wavelength that is converted by the first phosphor to provide the first spectrum; for example, LR23789 products include a first white LED characterized by a first spectrum identified on the LR23789 spec sheet as having a color temperature of approximately 2700 K. The first white LED is a phosphor conversion LED that converts the light output of an LED die to the first spectrum.

56. On information and belief, LR23789 products include at least one second white LED characterized by a second spectrum having a second color temperature, the at least one second white LED including a second phosphor, the at least one second white LED generating at least one second wavelength that is converted by the second phosphor to provide the second spectrum; for example, LR23280 products include a second white LED characterized by a second spectrum identified on the LR23789 spec sheet as having a color temperature of approximately 5000 K. The second white LED is a phosphor conversion LED that converts the light output of an LED die to the second spectrum.



57. On information and belief, the first color temperature differs from the second color temperature by at least 2200 degrees Kelvin; for example, the first color temperature, 2700 K, differs from the second color temperature, 5000 K, by a value of 2300 K, which is greater than 2200 K.

Infringing LR23791 Products

58. On information and belief, LR23791 products are apparatuses for generating essentially white light. LR23791 products are LED downlights that produce white light. An example of the LR23791 products is shown in the below image, taken from Defendant's website at www.allstarlighting.com/lr23791.html. Defendant provides a spec sheet for LR23791 products at: www.allstarlighting.com/media/catalog/product/5/c/5cctrdownlightspecsheet.pdf.



59. On information and belief, LR23791 products include at least one first white LED characterized by a first spectrum having a first color temperature, the at least one first white LED including a first phosphor, the at least one first white LED generating at least one first wavelength that is converted by the first phosphor to provide the first spectrum; for example, LR23791 products include a first white LED characterized by a first spectrum identified on the LR23791

spec sheet as having a color temperature of approximately 2700 K. The first white LED is a phosphor conversion LED that converts the light output of an LED die to the first spectrum.

60. On information and belief, LR23791 products include at least one second white LED characterized by a second spectrum having a second color temperature, the at least one second white LED including a second phosphor, the at least one second white LED generating at least one second wavelength that is converted by the second phosphor to provide the second spectrum; for example, LR23791 products include a second white LED characterized by a second spectrum identified on the LR23791 spec sheet as having a color temperature of approximately 5000 K. The second white LED is a phosphor conversion LED that converts the light output of an LED die to the second spectrum.



61. On information and belief, the first color temperature differs from the second color temperature by at least 2200 degrees Kelvin; for example, the first color temperature, 2700 K, differs from the second color temperature, 5000 K, by a value of 2300 K, which is greater than 2200 K.

Infringing LR23796 Products

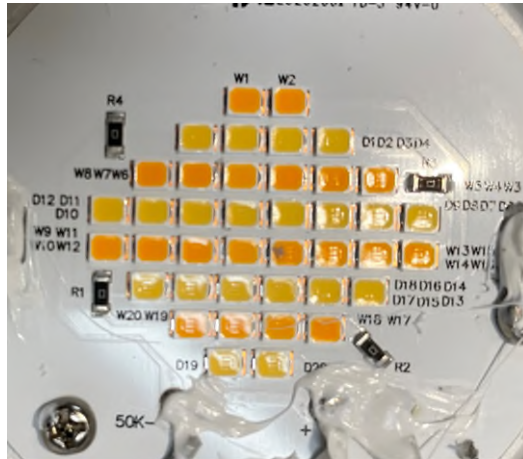
62. On information and belief, LR23796 products are apparatuses for generating essentially white light. LR23796 products are LED downlights that produce white light. An example of the LR23796 products is shown in the below image, taken from Defendant's website at www.allstarlighting.com/all-products/lr23796.html. Defendant provides a spec sheet for LR23796 products at: www.allstarlighting.com/media/catalog/product/5/c/5cctrddownlightspecsheet.pdf.



63. On information and belief, LR23796 products include at least one first white LED characterized by a first spectrum having a first color temperature, the at least one first white LED including a first phosphor, the at least one first white LED generating at least one first wavelength that is converted by the first phosphor to provide the first spectrum; for example, LR23796 products include a first white LED characterized by a first spectrum identified on the LR23796 spec sheet as having a color temperature of approximately 2700 K. The first white LED is a phosphor conversion LED that converts the light output of an LED die to the first spectrum.

64. On information and belief, LR23796 products include at least one second white LED characterized by a second spectrum having a second color temperature, the at least one second white LED including a second phosphor, the at least one second white LED generating at least one second wavelength that is converted by the second phosphor to provide the second spectrum; for example, LR23796 products include a second white LED characterized by a second spectrum

identified on the LR23796 spec sheet having a color temperature of approximately 5000 K. The second white LED is a phosphor conversion LED that converts the light output of an LED die to the second spectrum.



65. On information and belief, the first color temperature differs from the second color temperature by at least 2200 degrees Kelvin; for example, the first color temperature, 2700 K, differs from the second color temperature, 5000 K, by a value of 2300 K, which is greater than 2200 K.

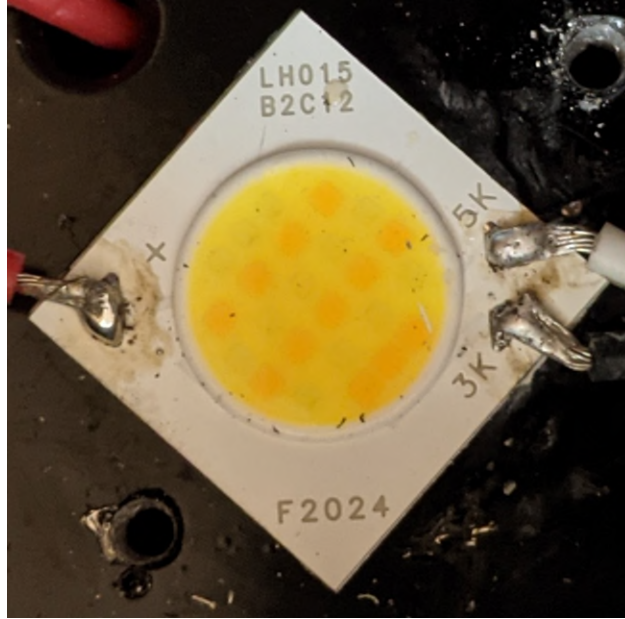
Infringing LR32180 Products

66. On information and belief, LR32180 products are apparatuses for generating essentially white light. LR32180 products are LED downlights that produce white light. An example of the LR32180 products is shown in the below image, taken from Defendant's website at www.allstarlighting.com/lr32180.html. Defendant provides a spec sheet for LR32180 products at: www.allstarlighting.com/media/catalog/product/l/r/lr32180-85specsheat.pdf.



67. On information and belief, LR32180 products include at least one first white LED characterized by a first spectrum having a first color temperature, the at least one first white LED including a first phosphor, the at least one first white LED generating at least one first wavelength that is converted by the first phosphor to provide the first spectrum; for example, LR32180 products include a first white LED characterized by a first spectrum identified on the LR32180 spec sheet as having a color temperature of approximately 2700 K. The first white LED is a phosphor conversion LED that converts the light output of an LED die to the first spectrum.

68. On information and belief, LR32180 products include at least one second white LED characterized by a second spectrum having a second color temperature, the at least one second white LED including a second phosphor, the at least one second white LED generating at least one second wavelength that is converted by the second phosphor to provide the second spectrum; for example, LR32180 products include a second white LED characterized by a second spectrum identified on the LR32180 spec sheet as having a color temperature of 5000 K. The second white LED is a phosphor conversion LED that converts the light output of an LED die to the second spectrum.



69. On information and belief, the first color temperature differs from the second color temperature by at least 2200 degrees Kelvin; for example, the first color temperature, 2700 K, differs from the second color temperature, 5000 K by a value of 2300 K, which is greater than 2200 K.

Infringing LR24025 Products

70. On information and belief, LR24025 products are apparatuses for generating essentially white light. LR24025 products are LED downlights that produce white light. An example of the LR24025 products is shown in the below image, taken from Defendant's website at www.allstarlighting.com/lr24025.html. Defendant provides a spec sheet for LR24025 products at: www.allstarlighting.com/media/catalog/product/l/r/lr24025-275cctsurfagemountpanelspecsheet_1.pdf.



71. On information and belief, LR24025 products include at least one first white LED characterized by a first spectrum having a first color temperature, the at least one first white LED including a first phosphor, the at least one first white LED generating at least one first wavelength that is converted by the first phosphor to provide the first spectrum; for example, LR24025 products include a first white LED characterized by a first spectrum identified on the LR24025 spec sheet as having a color temperature of approximately 2700 K. The first white LED is a phosphor conversion LED that converts the light output of an LED die to the first spectrum.

72. On information and belief, LR24025 products include at least one second white LED characterized by a second spectrum having a second color temperature, the at least one second white LED including a second phosphor, the at least one second white LED generating at least one second wavelength that is converted by the second phosphor to provide the second spectrum; for example, LR24025 products include a second white LED characterized by a second spectrum identified on the LR24025 spec sheet as having a color temperature of 5000 K. The second white LED is a phosphor conversion LED that converts the light output of an LED die to the second spectrum.



73. On information and belief, the first color temperature differs from the second color temperature by at least 2200 degrees Kelvin; for example, the first color temperature, 2700 K, differs from the second color temperature, 5000 K, by a value of 2300 K, which is greater than 2200 K.

74. The full extent of Defendant's infringement is not presently known to Signify. On information and belief, Defendant has made and sold products under different names or part numbers that infringe the '457 Patent in a similar manner. Signify makes this preliminary identification of infringing products and infringed claims in Count Two without the benefit of discovery or claim construction in this action, and expressly reserves the right to augment, supplement, and revise its identifications based on additional information obtained through discovery or otherwise.

75. Signify has suffered damages as a result of Defendant's infringement of the '457 Patent in an amount to be determined at trial.

76. On information and belief, Defendant has been aware of and has had notice and actual knowledge of the '457 Patent and its infringement of the '457 Patent since at least as early as October 2019. For example, Defendant was notified in an e-mail dated October 29, 2019 that Defendant's 5CCT line of products that allow color temperature selection between 2700-5000 K (a gap of 2300 K) infringed the '457 Patent.

77. On information and belief, Defendant's LR23280, LR23751, LR23785, LR23789, LR23791, LR23796, LR32180, and LR24025 products are 5CCT products that allow color temperature selection between 2700K-5000 K and are the same or substantially similar to the products noticed in the October 29, 2019 e-mail and thus Defendant was on actual notice of infringement for these products by October 29, 2019, or, if later, the date these products were first made, used, sold, offered for sale, or imported.

78. Signify additionally makes an identification of the following products (by model number) as appearing to be part of the 5CCT line of products noticed in the email dated October 29, 2019: LR23790, LR23791, LR23796, LR24846, LR24876, LR23280, LR23281, LR23282, LR23283, LR23284, LR23750, LR23753, LR23755, LR23758, LR23760, LR23763, LR23784, LR23795, LR23759, LR23764.

79. Defendant's pre-suit knowledge of the '457 Patent and failure to substantively address Signify's numerous notifications of infringement are sufficient to support a plausible inference that Defendant's infringement was willful and egregious, warranting enhancement of damages under 35 U.S.C. § 284, and attorneys' fees and costs incurred under 35 U.S.C. § 285.

COUNT THREE

INFRINGEMENT OF U.S. PATENT NO. 7,256,554

80. Signify incorporates by reference the allegations in paragraphs 1–15 as if fully set forth herein.

81. On information and belief, Defendant has infringed and is infringing claims of the '554 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(a) by manufacturing, using, offering to sell, selling, and/or importing infringing products.

82. Claim 1 of the '554 Patent recites:

An apparatus, comprising:

at least one first LED configured to generate first radiation having a first spectrum;
and

a first feed-forward driver coupled to the at least one first LED and configured to controllably vary a first intensity of the first radiation without monitoring or regulating a first voltage or a first current provided to the at least one first LED and without optically monitoring the first radiation,

wherein the first feed-forward driver comprises: at least one energy transfer element to store input energy derived from a power source and to provide output energy to the at least one first LED; and

at least one switch coupled to the at least one energy transfer element to control at least the input energy stored to the at least one energy transfer element.

83. On information and belief, Defendant has directly infringed and is directly infringing, at least, claim 1 of the '554 Patent by making, using, offering to sell, selling, and/or importing at least LR23171 and LR23280 products in this judicial district and elsewhere in the United States.

Infringing LR23171 Products

84. On information and belief, LR23171 products are LED downlights (apparatuses). An example of the LR23171 products is shown in the below image, taken from Defendant's Fall '19 catalog, available at: www.allstarlighting.com/media/LuxriteLEDFALL2019.pdf. The LED driver of an LR23171 product was reverse engineered and the resulting schematic is attached as Exhibit 7.



85. On information and belief, LR23171 products include at least one first LED configured to generate first radiation having a first spectrum; for example, LR23171 products include multiple LEDs, each configured to generate light in a spectrum perceived as white.



86. On information and belief, LR23171 products include a first feed-forward driver coupled to the at least one first LED and configured to controllably vary a first intensity of the first radiation without monitoring or regulating a first voltage or a first current provided to the at least one first LED and without optically monitoring the first radiation for example, LR23171 products include an LED driver coupled to the LEDs and configured to controllably vary an intensity of the LED light output according to the duty cycle of an input signal, without using a feedback path to monitor or regulate the voltage or current provided to the LEDs and without optically monitoring the light output of the LEDs.



87. On information and belief, the first feed-forward driver comprises at least one energy transfer element to store input energy derived from a power source and to provide output energy to the at least one first LED; for example, LR23171 products include at least one energy transfer element, formed by transformer T1, to store input energy derived from a power source and to provide output energy to the first LED.

88. On information and belief, the first feed-forward driver comprises at least one switch coupled to the at least one energy transfer element to control at least the input energy stored to the at least one energy transfer element; for example, LR23171 products include a MOSFET M2 coupled to the transformer T1 to control the input energy stored to the at least one energy transfer element.

Infringing LR23280 Products

89. On information and belief, LR23280 products are LED downlights (apparatuses). An example of the LR23280 products is shown in the below image, taken from Defendant's website at: www.allstarlighting.com/LR23280.html. The LED driver of an LR23280 product was reverse engineered and the resulting schematic is attached as Exhibit 8.



90. On information and belief, LR23280 products include at least one first LED configured to generate first radiation having a first spectrum; for example, LR23280 products include multiple LEDs, each configured to generate light in a spectrum perceived as white.



91. On information and belief, LR23280 products include a first feed-forward driver coupled to the at least one first LED and configured to controllably vary a first intensity of the first radiation without monitoring or regulating a first voltage or a first current provided to the at least one first LED and without optically monitoring the first radiation; for example, LR23280 products include an LED driver coupled to the LEDs and configured to controllably vary the LED light output according to the duty cycle of an input signal, without using a feedback path to monitor or regulate the voltage or current provided to the LEDs and without optically monitoring the light output of the LEDs.



92. On information and belief, the first feed-forward driver comprises at least one energy transfer element to store input energy derived from a power source and to provide output energy to the at least one first LED; for example, LR23280 products include at least one energy

transfer element, formed by transformer T1, to store input energy derived from a power source and to provide output energy to the LEDs.

93. On information and belief, the first feed-forward driver comprises at least one switch coupled to the at least one energy transfer element to control at least the input energy stored to the at least one energy transfer element; for example, LR23280 products include an 84YL0JL0M chip coupled to the transformer T1, the 84YL0JL0M chip including an internal switch to control the input energy stored to the at least one energy transfer element.

94. The full extent of Defendant's infringement is not presently known to Signify. On information and belief, Defendant has made and sold products under different names or part numbers that infringe the '554 Patent in a similar manner. Signify makes this preliminary identification of infringing products and infringed claims in Count Three without the benefit of discovery or claim construction in this action, and expressly reserves the right to augment, supplement, and revise its identifications based on additional information obtained through discovery or otherwise.

95. Signify has suffered damages as a result of Defendant's infringement of the '554 Patent in an amount to be determined at trial.

96. Defendant's infringement of the '554 Patent is causing irreparable harm for which Signify has no adequate remedy at law unless Defendant is enjoined by this Court. Under 35 U.S.C. § 283, Signify is entitled to a permanent injunction against further infringement of the '554 Patent.

97. On information and belief, Defendant has been aware of and has had notice and actual knowledge of the '554 Patent and its infringement of the '554 Patent since at least as early as February 2018. For example, Defendant was notified in an e-mail dated February 8, 2018 that

Defendant's 10" dimmable flush mount fixture (LR23091) infringed the '554 Patent. The e-mail serves as actual notice for the respective product(s) and for all substantially similar products.

98. On information and belief, LR23280 and LR23171 products are substantially similar to 10" dimmable flush mount fixture (LR23091) products, and thus Defendant was likewise on actual notice of infringement for these products by the e-mail of February 8, 2018, or, if later, the date these products were first made, used, sold, offered for sale, or imported.

99. Defendant's pre-suit knowledge of the '554 Patent and failure to substantively address Signify's numerous notifications of infringement are sufficient to support a plausible inference that Defendant's infringement was willful and egregious, warranting enhancement of damages under 35 U.S.C. § 284, and attorneys' fees and costs incurred under 35 U.S.C. § 285.

COUNT FOUR

INFRINGEMENT OF U.S. PATENT NO. 8,070,328

100. Signify incorporates by reference the allegations in paragraphs 1–15 as if fully set forth herein.

101. On information and belief, Defendant has infringed and is infringing claims of the '328 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(a) by manufacturing, using, offering to sell, selling, and/or importing infringing products.

102. Claim 1 of the '328 Patent recites:

An LED downlight fixture, comprising:

an array of LEDs in thermal connectivity with a heatsink, said array of LEDs positioned adjacent a first aperture of a multi-piece reflector assembly;

said multi-piece reflector assembly including: a first reflector having said first aperture disposed in an upper portion of said first reflector and an opposed larger second aperture in a lower portion of said first reflector;

a second reflector having a first aperture positioned adjacent said second aperture of said first reflector and a second aperture opposite said first aperture of said second reflector and defining a light exit passageway;

a diffuser positioned proximal to and extending across said second aperture of said first reflector and said first aperture of said second reflector.

103. On information and belief, Defendant has directly infringed and is directly infringing claim 1 of the '328 Patent by making, using, offering to sell, selling, and/or importing at least LR23230, LR23785, LR23789, and LR24810 products in this District and elsewhere in the United States.

Infringing LR23230 products

104. On information and belief, LR23230 products are LED downlight fixtures. An example of the LR23230 products is shown in the below image, taken from Defendant's website at: www.allstarlighting.com/lr23230.html.



105. On information and belief, LR23230 products include an array of LEDs in thermal connectivity with a heatsink, said array of LEDs positioned adjacent a first aperture of a multi-piece reflector assembly; for example, LR23230 products include an array of LEDs, formed by an LED package in thermal connectivity with a heatsink formed by a solid metal backing with fins, the array of LEDs is positioned adjacent to a first aperture of a multi-piece reflector assembly.



106. On information and belief, the multi-piece reflector assembly includes a first reflector having said first aperture disposed in an upper portion of said first reflector and an opposed larger second aperture in a lower portion of said first reflector; for example, LR23230 products include a multipiece reflector assembly formed from an upper reflector and trim reflector, the upper reflector including the first aperture in an upper portion and an opposed larger second aperture in a lower portion.

107. On information and belief, the multi-piece reflector assembly includes a second reflector having a first aperture positioned adjacent said second aperture of said first reflector and a second aperture opposite said first aperture of said second reflector and defining a light exit passageway; for example, LR23230 products include the trim reflector having a first aperture positioned adjacent the second aperture of the upper reflector, the trim reflector including a second aperture opposite the first aperture and defining a light exit passageway.



108. On information and belief, the multi-piece reflector assembly includes a diffuser positioned proximal to and extending across said second aperture of said first reflector and said

first aperture of said second reflector; for example, LR23230 products include a diffuser proximal to and extending across the second aperture of the first reflector and the first aperture of the trim reflector.



Infringing LR23785 products

109. On information and belief, LR23785 products are LED downlight fixtures. An example of the LR23785 products is shown in the below image, taken from Defendant's website at www.allstarlighting.com/lr23785.html.



110. On information and belief, LR23785 products include an array of LEDs in thermal connectivity with a heatsink, said array of LEDs positioned adjacent a first aperture of a multi-piece reflector assembly; for example, LR23785 products include an array of LEDs, formed by an

LED package in thermal connectivity with a heatsink formed by a solid metal backing with fins, the array of LEDs is positioned adjacent to a first aperture of a multi-piece reflector assembly.



111. On information and belief, the multi-piece reflector assembly includes a first reflector having said first aperture disposed in an upper portion of said first reflector and an opposed larger second aperture in a lower portion of said first reflector; for example, LR23785 products include a multipiece reflector assembly formed from an upper reflector and trim reflector, the upper reflector including the first aperture in an upper portion and an opposed larger second aperture in a lower portion.

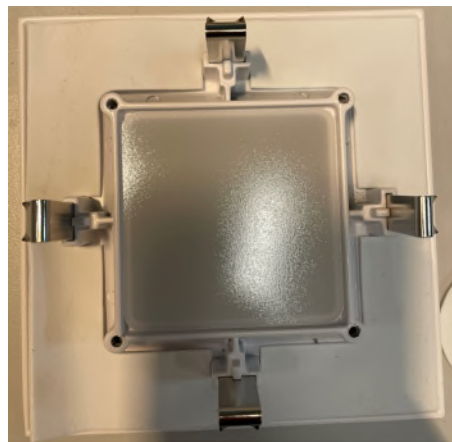


112. On information and belief, the multi-piece reflector assembly includes a second reflector having a first aperture positioned adjacent said second aperture of said first reflector and a second aperture opposite said first aperture of said second reflector and defining a light exit

passageway; for example, LR23785 products include the trim reflector having a first aperture positioned adjacent the second aperture of the upper reflector, the trim reflector including a second aperture opposite the first aperture and defining a light exit passageway.



113. On information and belief, the multi-piece reflector assembly includes a diffuser positioned proximal to and extending across said second aperture of said first reflector and said first aperture of said second reflector; for example, LR23785 products include a diffuser proximal to and extending across the second aperture of the first reflector and the first aperture of the trim reflector.



Infringing LR23789 products

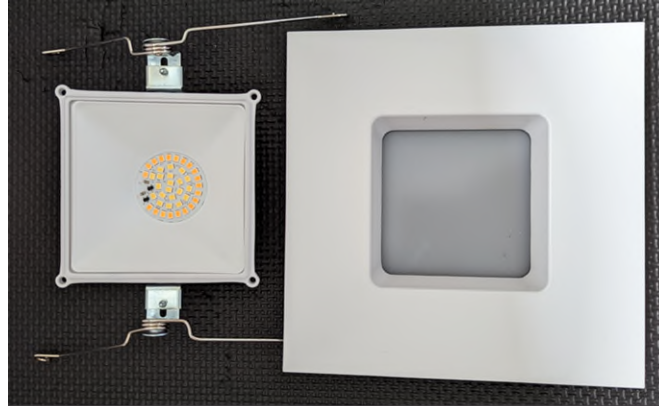
114. On information and belief, LR23789 products are LED downlight fixtures. An example of the LR23789 products is shown in the below image, taken from Defendant's website at www.allstarlighting.com/lr23789.html.



115. On information and belief, LR23789 products include an array of LEDs in thermal connectivity with a heatsink, said array of LEDs positioned adjacent a first aperture of a multi-piece reflector assembly; for example, LR23789 products include an array of LEDs, formed by an LED package in thermal connectivity with a heatsink formed by a solid metal backing with fins, the array of LEDs is positioned adjacent to a first aperture of a multi-piece reflector assembly.



116. On information and belief, the multi-piece reflector assembly includes a first reflector having said first aperture disposed in an upper portion of said first reflector and an opposed larger second aperture in a lower portion of said first reflector; for example, LR23789 products include a multipiece reflector assembly formed from an upper reflector and trim reflector, the upper reflector including the first aperture in an upper portion and an opposed larger second aperture in a lower portion.



117. On information and belief, the multi-piece reflector assembly includes a second reflector having a first aperture positioned adjacent said second aperture of said first reflector and a second aperture opposite said first aperture of said second reflector and defining a light exit passageway; for example, LR23789 products include the trim reflector having a first aperture positioned adjacent the second aperture of the upper reflector, the trim reflector including a second aperture opposite the first aperture and defining a light exit passageway.



118. On information and belief, the multi-piece reflector assembly includes a diffuser positioned proximal to and extending across said second aperture of said first reflector and said first aperture of said second reflector; for example, LR23789 products include a diffuser proximal to and extending across the second aperture of the first reflector and the first aperture of the trim reflector.

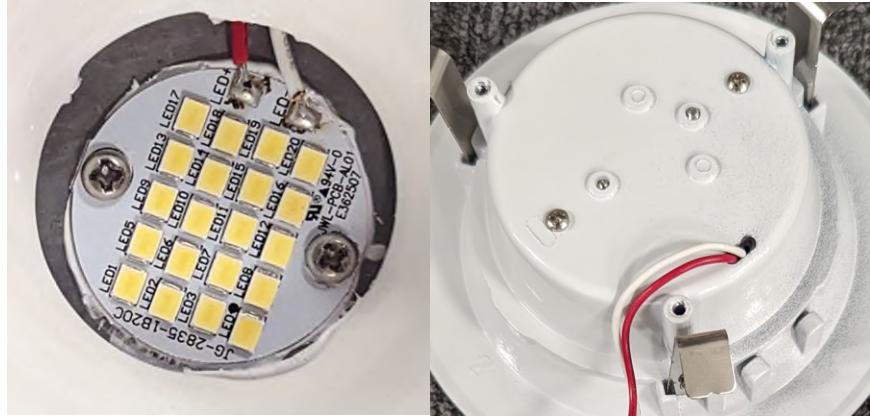


Infringing LR24810 products

119. On information and belief, LR24810 products are LED downlight fixtures. An example of the LR24810 products is shown in the below image, taken from an archived version of Defendant's website at web.archive.org/web/20171026150332/www.allstarlighting.com/all-products/luminaire/downlight-retrofit/round/lr24810.html.



120. On information and belief, LR24810 products include an array of LEDs in thermal connectivity with a heatsink, said array of LEDs positioned adjacent a first aperture of a multi-piece reflector assembly; for example, LR24810 products include an array of LEDs, formed by an LED package in thermal connectivity with a heatsink formed by a solid metal backing, the array of LEDs is positioned adjacent to a first aperture of a multi-piece reflector assembly.



121. On information and belief, the multi-piece reflector assembly includes a first reflector having said first aperture disposed in an upper portion of said first reflector and an opposed larger second aperture in a lower portion of said first reflector; for example, LR24810 products include a multipiece reflector assembly formed from an upper reflector and trim reflector, the upper reflector including the first aperture in an upper portion and an opposed larger second aperture in a lower portion.



122. On information and belief, the multi-piece reflector assembly includes a second reflector having a first aperture positioned adjacent said second aperture of said first reflector and a second aperture opposite said first aperture of said second reflector and defining a light exit passageway; for example, LR24810 products include the trim reflector having a first aperture

positioned adjacent the second aperture of the upper reflector, the trim reflector including a second aperture opposite the first aperture and defining a light exit passageway.



123. On information and belief, the multi-piece reflector assembly includes a diffuser positioned proximal to and extending across said second aperture of said first reflector and said first aperture of said second reflector; for example, LR24810 products include a diffuser proximal to and extending across the second aperture of the first reflector and the first aperture of the trim reflector.

124. The full extent of Defendant's infringement is not presently known to Signify. On information and belief, Defendant has made and sold products under different names or part numbers that infringe the '328 Patent in a similar manner. Signify makes this preliminary identification of infringing products and infringed claims in Count Four without the benefit of discovery or claim construction in this action, and expressly reserves the right to augment, supplement, and revise its identifications based on additional information obtained through discovery or otherwise.

125. Signify has suffered damages as a result of Defendant's infringement of the '328 Patent in an amount to be determined at trial.

126. Defendant's infringement of the '328 Patent is causing irreparable harm for which Signify has no adequate remedy at law unless Defendant is enjoined by this Court. Under 35 U.S.C. § 283, Signify is entitled to a permanent injunction against further infringement of the '328 Patent.

127. On information and belief, Defendant has been aware of and has had notice and actual knowledge of the '328 Patent and its infringement of the '328 Patent since at least as early as February 2018. For example, Defendant was notified in an e-mail dated February 8, 2018 that Defendant's dimmable retrofit downlight (LR24810) infringed the '328 Patent. The e-mail serves as actual notice for the respective product(s) and for all substantially similar products.

128. On information and belief, LR23230, LR23785, and LR23789 products are substantially similar to LR24810 products, and thus Defendant was likewise on actual notice of infringement for these products by the e-mail of February 8, 2018, or, if later, the date these products were first made, used, sold, offered for sale, or imported.

129. Defendant's pre-suit knowledge of the '328 Patent and failure to substantively address Signify's numerous notifications of infringement are sufficient to support a plausible inference that Defendant's infringement was willful and egregious, warranting enhancement of damages under 35 U.S.C. § 284, and attorneys' fees and costs incurred under 35 U.S.C. § 285.

COUNT FIVE

INFRINGEMENT OF U.S. PATENT NO. 8,348,479

130. Signify incorporates by reference the allegations in paragraphs 1–15 as if fully set forth herein.

131. On information and belief, Defendant has infringed and is infringing claims of the '479 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(a) by manufacturing, using, offering to sell, selling, and/or importing infringing products.

132. Claim 1 of the '479 Patent recites:

A downlight module, comprising:

a light emitting diode ("LED") package comprising a plurality of LEDs mounted to a common substrate;

a heat sink coupled to the LED package; and

at least two torsion springs located on opposite side surfaces of the downlight module proximal to an open end of the downlight module,

wherein the torsion springs are used to mount the heat sink and LED package within a recessed light fixture, wherein the LED package generates substantially all of the light emitted by the recessed lighting fixture through the open end of the downlight module.

133. On information and belief, Defendant has directly infringed and is directly infringing claim 1 of the '479 Patent by making, using, offering to sell, selling, and/or importing at least LR23789 and LR23796 products in this District and elsewhere in the United States.

Infringing LR23789 Products

134. On information and belief, LR23789 products are downlight modules. An example of the LR23789 products is shown in the below image, taken from Defendant's website at www.allstarlighting.com/lr23789.html. Defendant provides an installation guide for LR23789 products at: www.allstarlighting.com/media/catalog/product/5/-/5-6incetdownlightinstallguide.pdf.



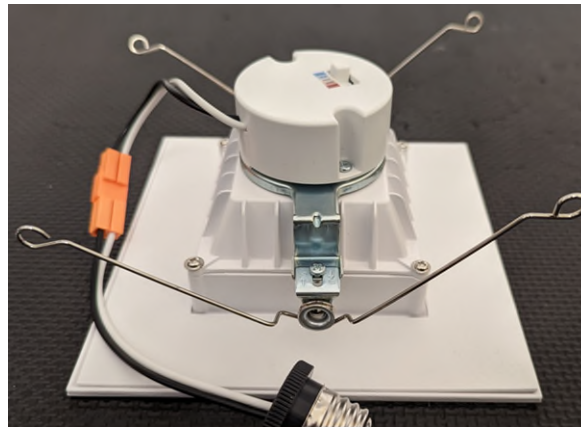
135. On information and belief, LR23789 products include a light emitting diode (“LED”) package comprising a plurality of LEDs mounted to a common substrate; for example, LR23789 products include an LED package comprising a plurality of LED light sources mounted to a printed circuit board.



136. On information and belief, LR23789 products include a heat sink coupled to the LED package; for example, LR23789 products include a heat sink, formed by a solid metal backing with fins coupled to the LED package via screws that extend through holes in the solid metal backing.



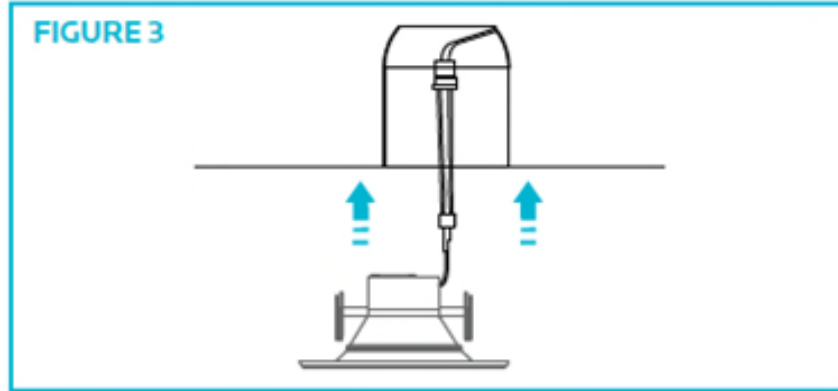
137. On information and belief, LR23789 products include at least two torsion springs located on opposite side surfaces of the downlight module proximal to an open end of the downlight module; for example, LR23789 products include two torsion springs located on opposite side surfaces of the downlight module, located near to an open end of the downlight module.



138. On information and belief, the torsion springs are used to mount the heat sink and LED package within a recessed light fixture as demonstrated by Defendant's installation guide for the LR23789 products.

6" RECESSED HOUSING

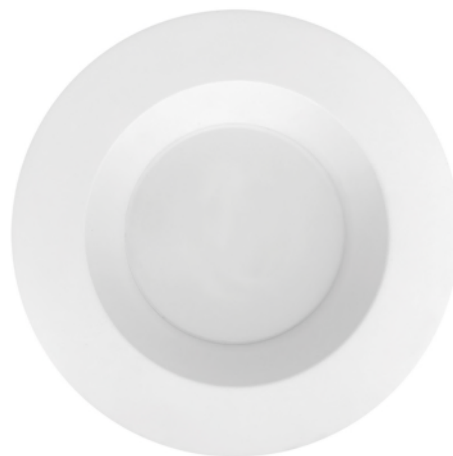
1. Disconnect all power prior to installation
2. Remove the existing trim and bulb to gain access to the socket.
3. Screw in the E26 socket adaptor into the open socket. **(FIGURE 1)**
4. Plug in the quick connector. **(FIGURE 2)**
5. Once connector is attached, gently push trim into fixture opening until flush with ceiling. **(FIGURE 3)**
6. (For 5" & 6" Downlights) Unscrew and adjust the plate inward or outward for 5" or 6" diameter.



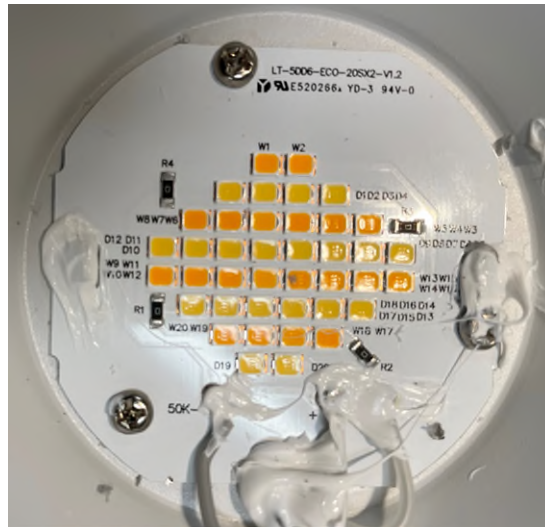
139. On information and belief, the LED package generates substantially all of the light emitted by the recessed lighting fixture through the open end of the downlight module. The LED package, being the only source of light within the downlight, generates substantially all of the light emitted by the recessed lighting fixture through the open end of the downlight.

Infringing LR23796 Products

140. On information and belief, LR23796 products are downlight modules. An example of the LR23796 products is shown in the below image, taken from Defendant's website at www.allstarlighting.com/all-products/lr23796.html. Defendant provides an installation guide for LR23796 products at: www.allstarlighting.com/media/catalog/product/5/-/5-6_22cctdownlightrd_triminstallguide_1.pdf.

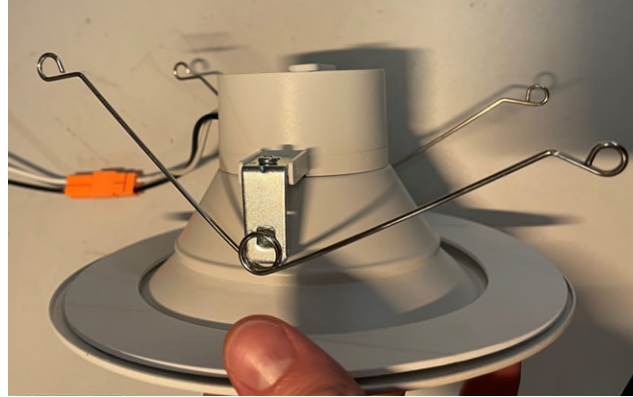


141. On information and belief, LR23796 products include a light emitting diode (“LED”) package comprising a plurality of LEDs mounted to a common substrate; for example, LR23796 products include an LED package comprising a plurality of LED light sources mounted to a printed circuit board.



142. On information and belief, LR23796 products include a heat sink coupled to the LED package; for example, LR23796 products include a heat sink, formed by a solid metal backing coupled to the LED package via screws that extend through holes in the solid metal backing, as shown above.

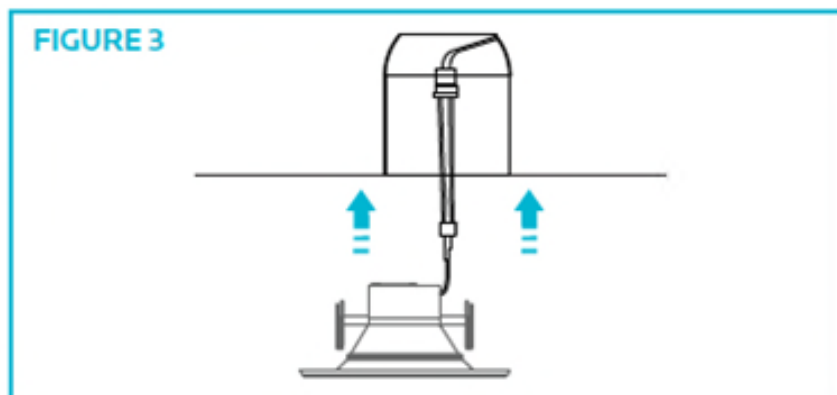
143. On information and belief, LR23796 products include at least two torsion springs located on opposite side surfaces of the downlight module proximal to an open end of the downlight module; for example, LR23796 products include two torsion springs located on opposite side surfaces of the downlight module, located near to an open end of the downlight module.



144. On information and belief, the torsion springs are used to mount the heat sink and LED package within a recessed light fixture as demonstrated by Defendant's installation guide for the LR23796 products.

RECESSED HOUSING

1. Turn off the main power prior to installation
2. Remove the existing trim and bulb to gain access to the socket.
3. Screw in the E26 socket adapter into the open socket. (FIGURE 1)
4. Plug in the quick connector and select CCT. (FIGURE 2)
5. Once connector is attached, squeeze spring clips and gently push trim into fixture opening until flush with ceiling. (FIGURE 3)
6. (For 5-6" Downlights) Unscrew and adjust the plate inward or outward for 5" or 6" diameter.



145. On information and belief, the LED package generates substantially all of the light emitted by the recessed lighting fixture through the open end of the downlight module. The LED package, being the only source of light within the downlight, generates substantially all of the light emitted by the recessed lighting fixture through the open end of the downlight.

146. The full extent of Defendant's infringement is not presently known to Signify. On information and belief, Defendant has made and sold products under different names or part numbers that infringe the '479 Patent in a similar manner. Signify makes this preliminary identification of infringing products and infringed claims in Count Five without the benefit of discovery or claim construction in this action, and expressly reserves the right to augment, supplement, and revise its identifications based on additional information obtained through discovery or otherwise.

147. Signify has suffered damages as a result of Defendant's infringement of the '479 Patent in an amount to be determined at trial.

148. Defendant's infringement of the '479 Patent is causing irreparable harm for which Signify has no adequate remedy at law unless Defendant is enjoined by this Court. Under 35 U.S.C. § 283, Signify is entitled to a permanent injunction against further infringement of the '479 Patent.

149. On information and belief, Defendant has been aware of and has had notice and actual knowledge of the '479 Patent and its infringement of the '479 Patent since at least as early as February 2021. For example, Defendant was notified in a letter dated February 16, 2021 that Defendant's Luxrite products incorporating torsion springs, such as LR23040, infringed the '479 Patent. The e-mail serves as actual notice for the respective product(s) and for all substantially similar products.

150. On information and belief, LR23796 and LR23789 products are substantially similar to LR23040 products, and thus Defendant was likewise on actual notice of infringement for these products by the e-mail of February 16, 2021, or, if later, the date these products were first made, used, sold, offered for sale, or imported.

151. Signify additionally makes an identification of the following products (by model number) as appearing to be products incorporating torsion springs substantially similar to LR23040: LR23795, LR23788, LR23043, LR23645, LR23592, LR23594, LR23593, LR23595, LR23045, LR24835, LR24836, LR24838, LR23618, LR23619, LR23620, LR23627, LR23628, LR23629, LR23650, LR23651, LR23652, LR23659, LR23660, LR23661, LR24886, LR24837.

152. Defendant's pre-suit knowledge of the '479 Patent and failure to substantively address Signify's numerous notifications of infringement are sufficient to support a plausible inference that Defendant's infringement was willful and egregious, warranting enhancement of damages under 35 U.S.C. § 284, and attorneys' fees and costs incurred under 35 U.S.C. § 285.

COUNT SIX

INFRINGEMENT OF U.S. PATENT NO. 9,709,253

153. Signify incorporates by reference the allegations in paragraphs 1–15 as if fully set forth herein.

154. On information and belief, Defendant has infringed and is infringing claims of the '253 Patent, including at least claim 30, in violation of 35 U.S.C. § 271(a) by manufacturing, using, offering to sell, selling, and/or importing infringing products.

155. Claim 30 of the '253 Patent recites:

A downlight module, comprising:

a heat sink comprising an upper surface and a lower surface;

at least one light emitting diode (LED) thermally coupled to the heat sink;

a reflector comprising a top end, a bottom end, and an internal surface extending from the top end to the bottom end and defining a cavity therein, at least a portion of the reflector being disposed below the at least one LED, the internal surface receiving at least a portion of light emitted from the at least one LED;

a driver electrically coupled to the at least one LED; and

an adapter comprising: at one end of the adapter, an Edison screw-in plug configured to be electrically coupled to an Edison base socket, and at an opposing

end of the adapter, a quick-connect connector configured to be connected to the driver,

wherein the at least one LED emits light through the cavity.

156. On information and belief, Defendant has directly infringed and is directly infringing claim 30 of the '253 Patent by making, using, offering to sell, selling, and/or importing at least LR23230, LR23785, LR23789, LR23791, and LR23796 products in this District and elsewhere in the United States.

Infringing LR23230 Products

157. On information and belief, LR23230 products are downlight modules. An example of the LR23230 products is shown in the below image, taken from Defendant's website at www.allstarlighting.com/lr23230.html. Defendant provides an installation guide for LR23230 products at: www.allstarlighting.com/media/catalog/product/4/i/4inretrofiteyeballinstallguide_2.pdf.



158. On information and belief, LR23230 products include a heat sink comprising an upper surface and a lower surface; for example, LR23230 products include a heat sink, formed by a solid metal backing with fins, which includes an upper surface and a lower surface.



159. On information and belief, LR23230 products include at least one light emitting diode (LED) thermally coupled to the heat sink; for example, LR23230 products include multiple LED light sources mounted to and in thermal communication with the solid metal backing.



160. On information and belief, LR23230 products include a reflector comprising a top end, a bottom end, and an internal surface extending from the top end to the bottom end and defining a cavity therein, at least a portion of the reflector being disposed below the at least one LED, the internal surface receiving at least a portion of light emitted from the at least one LED; for example, LR23230 products include a reflector with a top end, a bottom end, and an internal surface extending from the top end to the bottom end and defining a cavity therein, the reflector disposed below the LEDs and receiving a portion of the light emitted from the LED light sources.



161. On information and belief, LR23230 products include a driver electrically coupled to the at least one LED; for example, LR23230 products include a driver electrically coupled to the LED light sources by a set of wires.

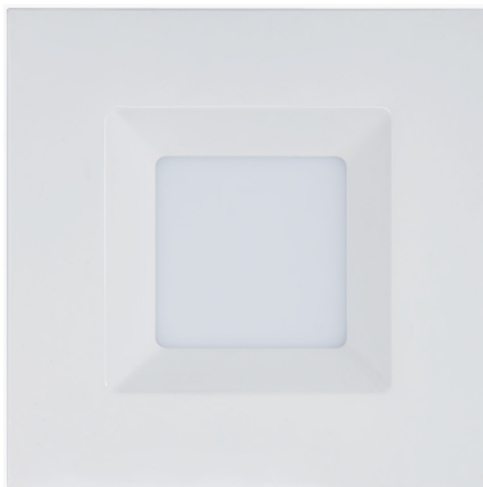
162. On information and belief, LR23230 products include an adapter comprising: at one end of the adapter, an Edison screw-in plug configured to be electrically coupled to an Edison base socket, and at an opposing end of the adapter, a quick-connect connector configured to be connected to the driver; for example, LR23230 products include an adapter that comprises, at one end, an E26 screw-in plug adapter configured to be coupled to an Edison base socket, and, at another end, a quick-connect connector configured to be connected to the driver via wires.



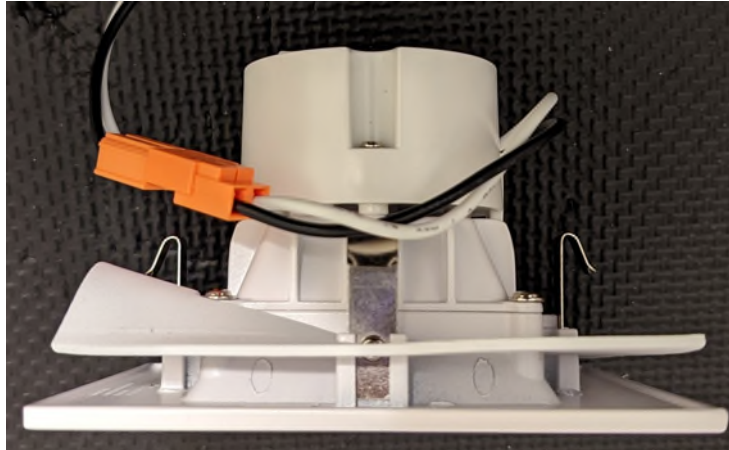
163. On information and belief, the at least one LED emits light through the cavity. The LED light sources emit light through the cavity of the housing.

Infringing LR23785 Products

164. On information and belief, LR23785 products are downlight modules. An example of the LR23785 products is shown in the below image, taken from Defendant’s website at www.allstarlighting.com/LR23785.html. Defendant provides an installation guide for LR23785 products at: www.allstarlighting.com/media/catalog/product/4/i/4incctdownlightinstallguide_1.pdf.



165. On information and belief, LR23785 products include a heat sink comprising an upper surface and a lower surface; for example, LR23785 products include a heat sink, formed by a solid metal backing with fins, which includes an upper surface and a lower surface.



166. On information and belief, LR23785 products include at least one light emitting diode (LED) thermally coupled to the heat sink; for example, LR23785 products include multiple LED light sources mounted to and in thermal communication with the solid metal backing.

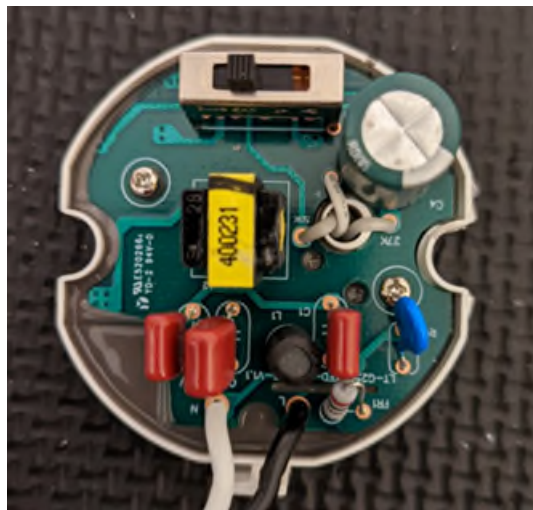


167. On information and belief, LR23785 products include a reflector comprising a top end, a bottom end, and an internal surface extending from the top end to the bottom end and defining a cavity therein, at least a portion of the reflector being disposed below the at least one LED, the internal surface receiving at least a portion of light emitted from the at least one LED;

for example, LR23785 products include a reflector with a top end, a bottom end, and an internal surface extending from the top end to the bottom end and defining a cavity therein, the reflector disposed below the LEDs and receiving a portion of the light emitted from the LED light sources.

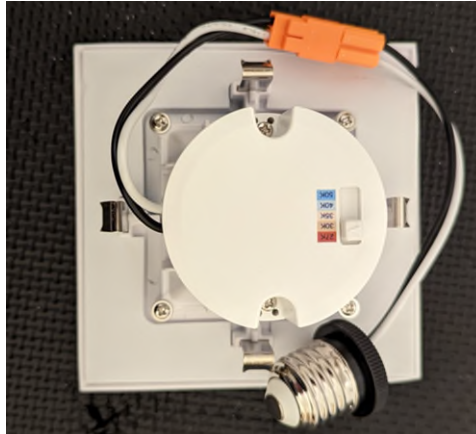


168. On information and belief, LR23785 products include a driver electrically coupled to the at least one LED; for example, LR23785 products include a driver electrically coupled to the LED light sources by a set of wires.



169. On information and belief, LR23785 products include an adapter comprising: at one end of the adapter, an Edison screw-in plug configured to be electrically coupled to an Edison base socket, and at an opposing end of the adapter, a quick-connect connector configured to be

connected to the driver; for example, LR23785 products include an adapter that comprises, at one end, an E26 screw-in plug adapter configured to be coupled to an Edison base socket, and, at another end, a quick-connect connector configured to be connected to the driver via wires.



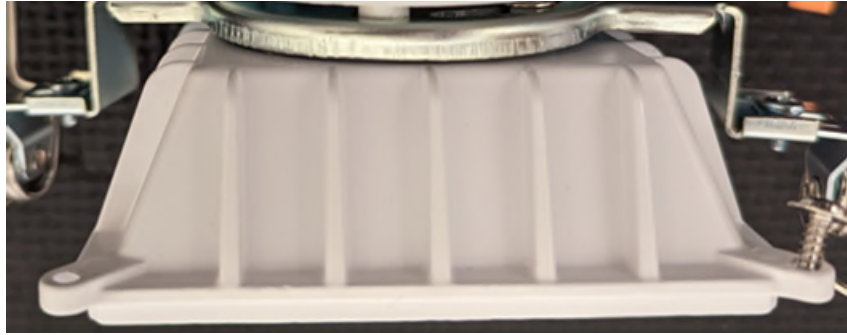
170. On information and belief, the at least one LED emits light through the cavity. The LED light sources emit light through the cavity of the housing.

Infringing LR23789 Products

171. On information and belief, LR23789 products are downlight modules for use with a recessed housing located above a ceiling. An example of the LR23789 products is shown in the below image, taken from Defendant's website at www.allstarlighting.com/lr23789.html. Defendant provides an installation guide for LR23789 products at: www.allstarlighting.com/media/catalog/product/5/-/5-6incctdownlightinstallguide.pdf.



172. On information and belief, LR23789 products include a heat sink comprising an upper surface and a lower surface; for example, LR23789 products include a heat sink, formed by a solid metal backing with fins, which includes an upper surface and a lower surface.

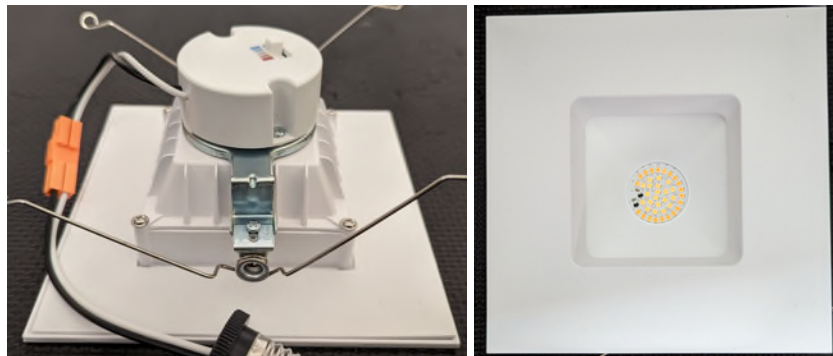


173. On information and belief, LR23789 products include at least one light emitting diode (LED) thermally coupled to the heat sink; for example, LR23789 products include multiple LED light sources mounted to and in thermal communication with the solid metal backing.

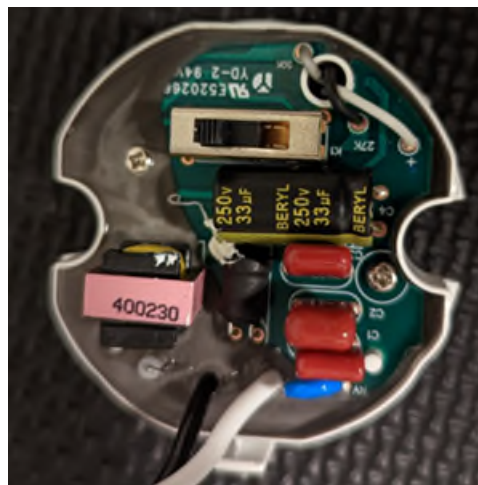


174. On information and belief, LR23789 products include a reflector comprising a top end, a bottom end, and an internal surface extending from the top end to the bottom end and defining a cavity therein, at least a portion of the reflector being disposed below the at least one LED, the internal surface receiving at least a portion of light emitted from the at least one LED; for example, LR23789 products include a reflector with a top end, a bottom end, and an internal

surface extending from the top end to the bottom end and defining a cavity therein, the reflector disposed below the LEDs and receiving a portion of the light emitted from the LED light sources.



175. On information and belief, LR23789 products include a driver electrically coupled to the at least one LED; for example, LR23789 products include a driver electrically coupled to the LED light sources by a set of wires.



176. On information and belief, LR23789 products include an adapter comprising: at one end of the adapter, an Edison screw-in plug configured to be electrically coupled to an Edison base socket, and at an opposing end of the adapter, a quick-connect connector configured to be connected to the driver; for example, LR23789 products include an adapter that comprises, at one end, an E26 screw-in plug adapter configured to be coupled to an Edison base socket, and, at another end, a quick-connect connector configured to be connected to the driver via wires.



177. On information and belief, the at least one LED emits light through the cavity. The LED light sources emit light through the cavity of the housing.

Infringing LR23791 Products

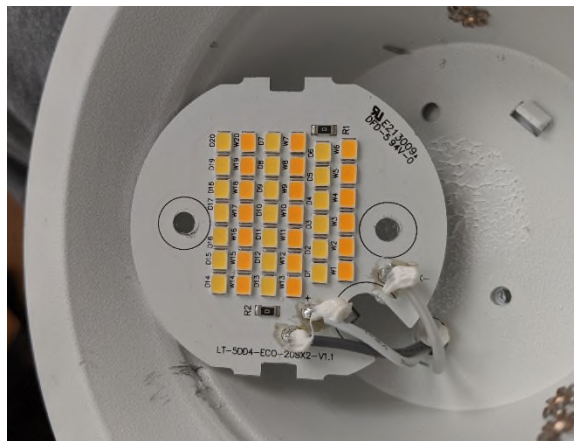
178. On information and belief, LR23791 products are downlight modules for use with a recessed housing located above a ceiling. An example of the LR23791 products is shown in the below image, taken from Defendant's website at www.allstarlighting.com/lr23791.html. Defendant provides an installation guide for LR23791 products at: www.allstarlighting.com/media/catalog/product/4/_/4_22cctdownlightrdtriminstallguide.pdf.



179. On information and belief, LR23791 products include a heat sink comprising an upper surface and a lower surface; for example, LR23791 include a heat sink, formed by a solid metal backing, which includes an upper surface and a lower surface.

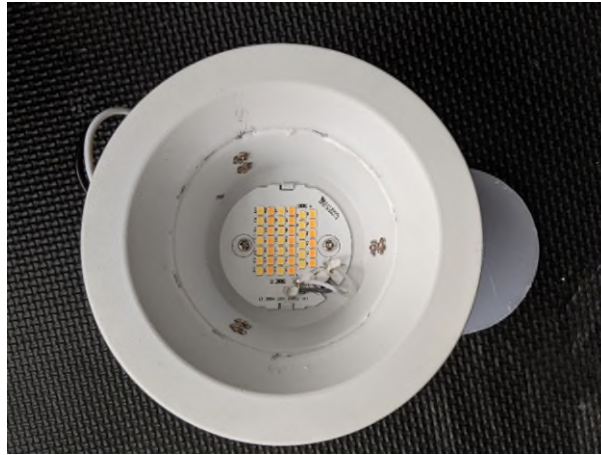


180. On information and belief, LR23791 products include at least one light emitting diode (LED) thermally coupled to the heat sink; for example, LR23791 products include multiple LED light sources mounted to and in thermal communication with the solid metal backing.



181. On information and belief, LR23791 products include a reflector comprising a top end, a bottom end, and an internal surface extending from the top end to the bottom end and defining a cavity therein, at least a portion of the reflector being disposed below the at least one LED, the internal surface receiving at least a portion of light emitted from the at least one LED; for example, LR23791 products include a reflector with a top end, a bottom end, and an internal

surface extending from the top end to the bottom end and defining a cavity therein, the reflector disposed below the LEDs and receiving a portion of the light emitted from the LED light sources.



182. On information and belief, LR23791 products include a driver electrically coupled to the at least one LED; for example, LR23791 products include a driver electrically coupled to the LED light sources by a set of wires.



183. On information and belief, LR23791 products include an adapter comprising: at one end of the adapter, an Edison screw-in plug configured to be electrically coupled to an Edison base socket, and at an opposing end of the adapter, a quick-connect connector configured to be connected to the driver; for example, LR23791 products include an adapter that comprises, at one end, an E26 screw-in plug adapter configured to be coupled to an Edison base socket, and, at another end, a quick-connect connector configured to be connected to the driver via wires.



184. On information and belief, the at least one LED emits light through the cavity. The LED light sources emit light through the cavity of the housing.

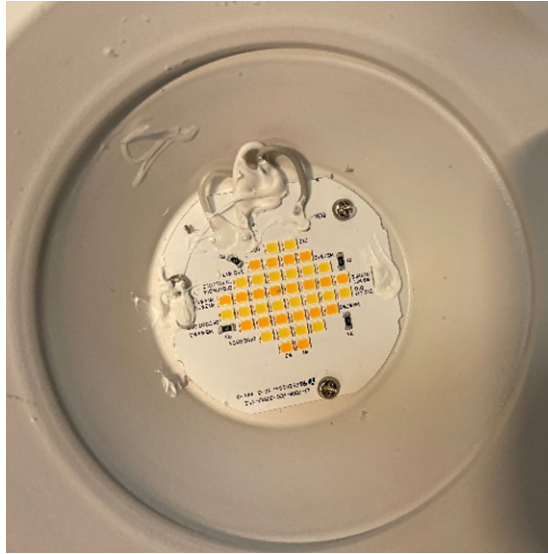
Infringing LR23796 Products

185. On information and belief, LR23796 products are downlight modules for use with a recessed housing located above a ceiling. An example of the LR23796 products is shown in the below image, taken from Defendant's website at www.allstarlighting.com/all-products/lr23796.html. Defendant provides an installation guide for LR23796 products at: www.allstarlighting.com/media/catalog/product/5/-/5-6_22cctdownlightrdtriminstallguide_1.pdf.

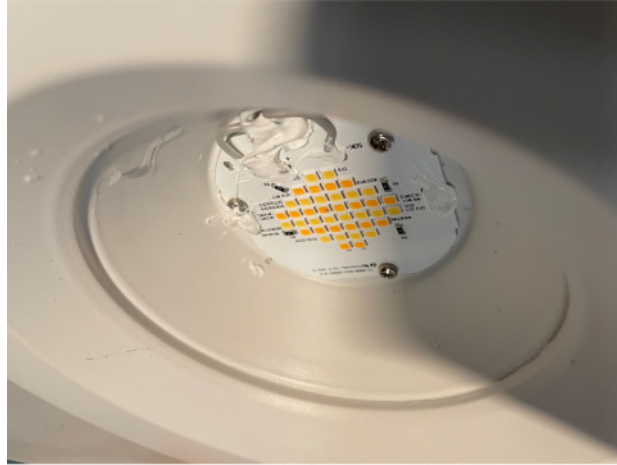


186. On information and belief, LR23796 products include a heat sink comprising an upper surface and a lower surface; for example, LR23796 products include a heat sink, formed by a solid metal backing, which includes an upper surface and a lower surface.

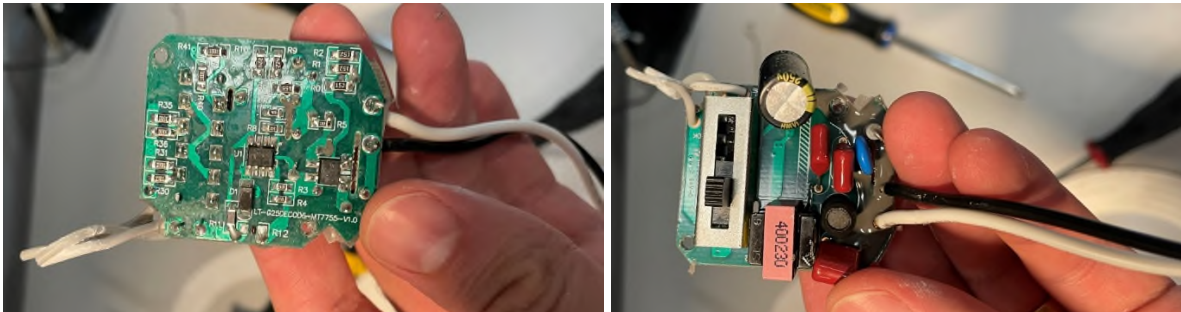
187. On information and belief, LR23796 products include at least one light emitting diode (LED) thermally coupled to the heat sink; for example, LR23796 products include multiple LED light sources mounted to and in thermal communication with the solid metal backing.



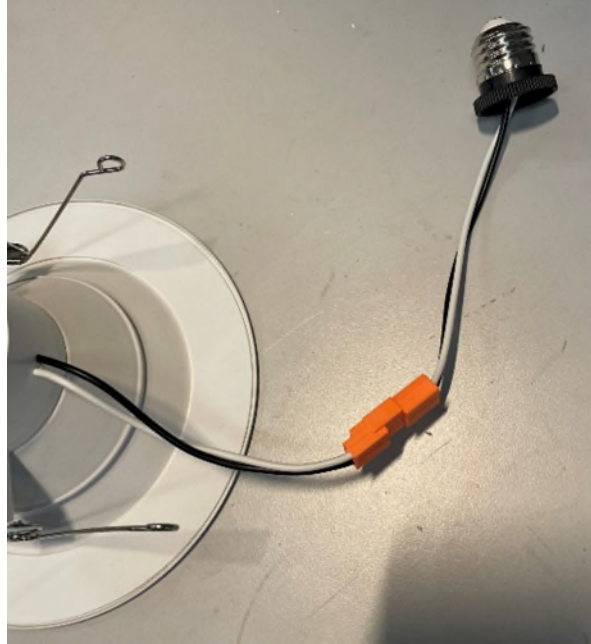
188. On information and belief, LR23796 products include a reflector comprising a top end, a bottom end, and an internal surface extending from the top end to the bottom end and defining a cavity therein, at least a portion of the reflector being disposed below the at least one LED, the internal surface receiving at least a portion of light emitted from the at least one LED; for example, LR23796 products include a reflector with a top end, a bottom end, and an internal surface extending from the top end to the bottom end and defining a cavity therein, the reflector disposed below the LEDs and receiving a portion of the light emitted from the LED light sources.



189. On information and belief, LR23796 products include a driver electrically coupled to the at least one LED; for example, LR23796 products include a driver electrically coupled to the LED light sources by a set of wires.



190. On information and belief, LR23796 products include an adapter comprising: at one end of the adapter, an Edison screw-in plug configured to be electrically coupled to an Edison base socket, and at an opposing end of the adapter, a quick-connect connector configured to be connected to the driver; for example, LR23796 products include an adapter that comprises, at one end, an E26 screw-in plug adapter configured to be coupled to an Edison base socket, and, at another end, a quick-connect connector configured to be connected to the driver via wires.



191. On information and belief, the at least one LED emits light through the cavity. The LED light sources emit light through the cavity of the housing.

192. The full extent of Defendant's infringement is not presently known to Signify. On information and belief, Defendant has made and sold products under different names or part numbers that infringe the '253 Patent in a similar manner. Signify makes this preliminary identification of infringing products and infringed claims in Count Six without the benefit of discovery or claim construction in this action, and expressly reserves the right to augment, supplement, and revise its identifications based on additional information obtained through discovery or otherwise.

193. Signify has suffered damages as a result of Defendant's infringement of the '253 Patent in an amount to be determined at trial.

194. Defendant's infringement of the '253 Patent is causing irreparable harm for which Signify has no adequate remedy at law unless Defendant is enjoined by this Court. Under 35 U.S.C. § 283, Signify is entitled to a permanent injunction against further infringement of the '253 Patent.

195. On information and belief, Defendant has been aware of and has had notice and actual knowledge of the '253 Patent and its infringement of the '253 Patent since at least as early as February 2021. For example, Defendant was notified in a letter dated February 16, 2021 that Defendant's Luxrite eyeball products (e.g., LR23230) and Luxrite downlight products (e.g., LR23791), as well as Luxrite products incorporating an Edison-style adapter (e.g., LR23235) infringed the '253 Patent. The e-mail serves as actual notice for the respective product(s) and for all substantially similar products.

196. On information and belief, LR23230, LR23785, LR23789, LR23791, and LR23796 products incorporate Edison style adapters and are the same as or substantially similar to LR23235, LR23230, and/or LR23791 products and thus Defendant was likewise on actual notice of infringement for these products by the e-mail of February 16, 2021, or, if later, the date these products were first made, used, sold, offered for sale, or imported.

197. Signify additionally makes an identification of the following products (by model number) as appearing to be substantially similar to LR23230, LR23791, and/or LR23235 products: LR23786, LR23787, LR23793, LR23794, LR23790, LR23795, LR23784, LR23788, LR23233, LR23043, LR24960, LR23640, LR23645, LR23590, LR23592, LR23594, LR23591, LR23593, LR23595, LR23040, LR23045, LR23235, LR24830, LR24831, LR24833, LR24835, LR24836, LR24838, LR23600, LR23601, LR23602, LR23609, LR23610, LR23611, LR23618, LR23619, LR23620, LR23627, LR23628, LR23629, LR23650, LR23651, LR23652, LR23659, LR23660, LR23661, LR24870, LR24874, LR24878, LR24886, LR24832, LR24837, LR24826, LR24828, LR24829. Of these, the products belonging to the Retrofit Slim line of products are substantially similar to the LR23230, LR23791, and/or LR23235 products when combined with an LR23640 or LR23645 adapter, also sold by Defendant.

198. Defendant's pre-suit knowledge of the '253 Patent and failure to substantively address Signify's numerous notifications of infringement are sufficient to support a plausible inference that Defendant's infringement was willful and egregious, warranting enhancement of damages under 35 U.S.C. § 284, and attorneys' fees and costs incurred under 35 U.S.C. § 285.

PRAYER FOR RELIEF

WHEREFORE, Signify prays for the following judgments and relief:

- (a) A judgment that Defendant has infringed and is infringing the Patents-in-Suit;
- (b) A permanent injunction against Defendant and its affiliates, subsidiaries, assigns, employees, agents or anyone acting in privity or concert from infringing the Patents-in-Suit, including enjoining the making, offering to sell, selling, using, or importing into the United States products claimed in any of the claims of the Patents-in-Suit; using or performing methods claimed in any of the claims of the Patents-in-Suit; inducing others to use and perform methods that infringe any claim of the Patents-in-Suit; or contributing to others using and performing methods that infringe any claim of the Patents-in-Suit, until the expiration of the Patents-in-Suit;
- (c) An award of damages adequate to compensate Signify for Defendant's patent infringement, and an accounting to adequately compensate Signify for the infringement, including, but not limited to, lost profits and/or a reasonable royalty;
- (d) An award of pre-judgment and post-judgment interest at the maximum rate allowed by law;
- (e) An order finding that this is an exceptional case and awarding Signify its costs, expenses, disbursements, and reasonable attorneys' fees related to Defendant's patent infringement under 35 U.S.C. § 285 and all other applicable statutes, rules and common law;
- (f) An order finding Defendant's infringement willful and egregious and awarding Signify enhanced damages under 35 U.S.C. § 284; and
- (g) Such other further relief, in law or equity, as this Court deems just and proper.

JURY TRIAL

In accordance with Rule 38 of the Federal Rules of Civil Procedure, Signify hereby demands a jury trial on all issues triable before a jury.

Dated: May 26, 2022

Respectfully submitted,

s/ Thomas A. Martin

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