

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

BX LED LLC,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 6:24-00095
)	
CURRENT LIGHTING SOLUTIONS, LLC,)	JURY TRIAL DEMANDED
Defendant.)	
)	
)	
)	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff BX LED LLC (“BX” or “Plaintiff”), by and through the undersigned counsel, hereby asserts the following claims for patent infringement against Defendant Current Lighting Solutions, LLC (“Current Lighting” or “Defendant”), and alleges as follows:

NOTICE OF RELATED CASES

Plaintiff BX identifies the following related cases as involving the infringement of a patent already in suit in this district.

- BX LED LLC v. RAB Lighting, Inc., 3:23-cv-01323-ADA
- BX LED LLC v. Lowe’s Companies, Inc., 6:23-cv-00451-ADA
- BX LED LLC v. Home Depot USA, Inc. d/b/a The Home Depot, 6:22-cv-00444-ADA
- BX LED LLC v. Walmart Inc. f/k/a Walmart Stores, Inc., 6:22-cv-00445-ADA; and
- BX LED LLC v. Wayfair LLC, 6:22-cv-00446-ADA;

SUMMARY

1. Plaintiff is the owner by assignment of all right, title and interest in United States Patent Nos. 6,869,812; 7,901,109; 7,973,465; 8,143,769; 8,567,988; and 10,966,300 (collectively, the “Patents-in-Suit”). Defendant infringes the Patents-in-Suit at least by selling, without authorization, Plaintiff’s proprietary technologies in a number of its commercial products including, *inter alia*, Current Lighting Lumination LBT, Current Lighting Albeo ABV, Current Lighting LED HID Type B Bulb, Current Lighting Evolve EFH Floodlight, Current Lighting Evolve ERL1 Roadway Light, Current Lighting Evolve EWLS Wall Pack, Current Lighting SGD Sling Dusk-to-Dawn, Current Lighting Compass CU2, Current Lighting R20 LED Bulb, among other substantially similar products (collectively, the “Accused Products”). These Accused Products are marketed, offered, and distributed throughout the United States, including in this District.

2. By this action, Plaintiff seeks to obtain compensation for the harm Plaintiff has suffered, and will continue to suffer, as a result of Defendant’s infringement of the Patents-in-Suit.

NATURE OF THE ACTION

3. This is a civil action for patent infringement arising under the patent laws of the United States, 35 U.S.C. § 1 *et seq.*

4. Defendant has infringed and continues to infringe, and at least as early as the filing and/or service of this Complaint, has induced and continues to induce infringement of, and has contributed to and continues to contribute to infringement of, one or more claims of Plaintiff’s Patents-in-Suit at least by making, using, selling, and/or offering to sell the Accused Products in the United States, including in this District, and/or by importing the Accused Products into the United States.

5. Plaintiff is the legal owner by assignment of the Patents-in-Suit, which were duly and legally issued by the United States Patent and Trademark Office (“USPTO”). Plaintiff seeks monetary damages for Defendant’s infringement of the Patents-in-Suit.

THE PARTIES

6. Plaintiff BX LED LLC is a Texas limited liability company with its principal place of business at 8140 Walnut Hill Ln., Ste. 500, Dallas, TX 75231. Plaintiff is the owner of the intellectual property rights at issue in this action.

7. On information and belief, Defendant Current Lighting Solutions, LLC is a limited liability company organized and existing under the laws of Delaware located at 25825 Science Park Drive, Suite 400, Beachwood, OH 44122.

8. On information and belief, Defendant operates numerous regular and established places of business throughout the Western District of Texas, including places of business at 103 Jessica Lane Unit A, Del Rio, Texas, and 710 Hesters Crossing Rd, Suite 190, Round Rock, Texas.

9. On information and belief, Defendant directly and/or indirectly distributes, markets, offers to sell, and/or sells the Accused Products in the United States and/or imports the Accused Products into the United States, including in the Western District of Texas, and otherwise directs infringing activities to this District in connection with the Accused Products.

JURISDICTION AND VENUE

10. As this is a civil action for patent infringement arising under the patent laws of the United States, 35 U.S.C. § 1 et seq., this Court has subject matter jurisdiction over the matters asserted herein under 28 U.S.C. §§ 1331 and 1338(a).

11. This Court has personal jurisdiction over Defendant because Defendant has (i) availed itself of the rights and benefits of the laws of the State of Texas, (ii) transacted, conducted,

and/or solicited business and engaged in a persistent course of conduct in the State of Texas (and in this District), (iii) derived substantial revenue from the sales and/or use of products, such as the Accused Products, in the State of Texas (and in this District), (iv) purposefully directed activities (directly and/or through intermediaries), such as marketing, shipping, distributing, offering for sale, selling, and/or advertising the Accused Products, at residents of the State of Texas (and residents in this District), (v) delivered Accused Products into the stream of commerce with the expectation that the Accused Products will be used and/or purchased by consumers in the State of Texas (and in this District), and (vi) committed acts of patent infringement in the State of Texas (and in this District).

12. Venue is proper in this District under 28 U.S.C. §§ 1391(b) and (c) and 28 U.S.C. § 1400(b), as Defendant conducts regular business in this district through distributors and because it commits acts of infringement in this district.

PATENTS-IN-SUIT

U.S. Patent No. 6,869,812

13. U.S. Patent No. 6,869,812 (the “’812 Patent”) is titled “High power AlInGaN based multichip light emitting diode” and was issued on March 22, 2005. A true and correct copy of the ’812 Patent is attached as Exhibit A.

14. The ’812 Patent was filed on May 13, 2003 as U.S. Patent Application No. 10/438,108.

15. Plaintiff is the owner of all rights, title, and interest in and to the ’812 Patent, with the full and exclusive right to bring suit to enforce the ’812 Patent, including the right to recover for past infringement.

16. The ’812 Patent is valid and enforceable under United States Patent Laws.

17. The '812 Patent recognized problems with existing light emitting diodes at the time of the invention of the '812 Patent.

18. For instance, the inventors of the '812 Patent recognized that prior art light emitting diodes had issues of insufficient illumination and poor efficiency, limiting their ability “to function in some applications, such as providing general illumination, e.g., ambient lighting.” '812 Patent at 1:24-31. Prior attempts to address these issues involved the use of multiple LEDs and/or larger device sizes. *See id.* at 1:38-45, 2:16-18.

19. The use of larger device sizes introduced other impediments towards efficiency, e.g., lower light extraction efficiency relative to smaller devices. *See id.* at 2:61-65. Light extraction efficiency refers to the issue that when light is generated in an LED, some light fails to escape the device, because “as the device size increases, light has a tendency to bounce more and thus travel a longer distance before exiting the device, resulting in increased light loss,” whereas “light tends to bounce fewer times in a smaller device and thus travels a shorter distance.” *See id.* at 3:12-16.

20. The inventors of the '812 Patent recognized that it was “desirable to minimize the number of bounces and the total travel distance before light can escape for any light transmissive layer of an LED.” *See id.* at 3:9-11.

21. In view of the foregoing, among other advantages over the prior art, the inventions claimed by the '812 Patent provide the benefits of “superior light output efficiency” over the prior art by way of an active surface with elongated geometry. *See id.* at 11:46-48. With elongated geometry, “light can easily escape from the long dimension side, thus substantially enhancing the brightness of the device. The elongated configuration of the LED chip also enhances heat dissipation, thus allowing the device to be operated at higher current levels to facility further

enhancement of the light output thereof, as well as for improvement of the efficiency thereof.” *See id.* at 8:62-9:3.

U.S. Patent No. 7,901,109

22. U.S. Patent No. 7,901,109 (the “’109 Patent”) is titled “Heat sink apparatus for solid state lights” and was issued on March 8, 2011. A true and correct copy of the ’109 Patent is attached as Exhibit B.

23. The ’109 Patent was filed on June 30, 2008 as U.S. Patent Application No. 12/165,563.

24. Plaintiff is the owner of all rights, title, and interest in and to the ’109 Patent, with the full and exclusive right to bring suit to enforce the ’109 Patent, including the right to recover for past infringement.

25. The ’109 Patent is valid and enforceable under United States Patent Laws.

26. The ’109 Patent recognized problems with existing solid state lights at the time of invention.

27. For instance, the ’109 Patent recognized that the “operational power of many current solid state lights, such as light-emitting diode (LED) lights, is often limited by the solid state lights’ ability to dissipate heat.” ’109 Patent at 1:11-13. “Accordingly, increasing the ability of a solid state light to dissipate heat allows for higher power, and thus brighter, more efficient solid state lights.” *Id.* at 1:18-20.

28. In view of the foregoing, the ’109 Patent discloses, in one embodiment, “a heat sink apparatus for a solid state light” that “comprises a heat sink comprising a first end configured for connection to a solid state light, a second end opposite the first end, and a heat dissipating portion between the first end and the second end. The heat dissipating portion has an elongated portion

and a plurality of fins for dissipating heat generated by the solid state light, the fins extending from the elongated portion.” *Id.* at 1:27-34. Through this, and other disclosed embodiments, the ’109 Patent offers advantages of, *inter alia*, increasing the heat dissipation, power, brightness, and efficiency of solid state lighting over the prior art.

U.S. Patent No. 7,973,465

29. U.S. Patent No. 7,973,465 (the “’465 Patent”) is titled “Light emitting diode with thin multilayer phosphor film” and was issued on July 5, 2011. A true and correct copy of the ’465 Patent is attached as Exhibit C.

30. The ’465 Patent was filed on July 15, 2010 as U.S. Patent Application No. 12/836,852.

31. Plaintiff is the owner of all rights, title, and interest in and to the ’465 Patent, with the full and exclusive right to bring suit to enforce the ’465 Patent, including the right to recover for past infringement.

32. The ’465 Patent is valid and enforceable under United States Patent Laws.

33. The inventors of the ’465 Patent recognized problems with the application of phosphor material to LEDs and other solid state lighting devices at the time. Specifically, phosphor materials were used to convert blue or ultraviolet LEDs to white light; to that end, the prior art encapsulated blue and ultraviolet LEDs with phosphor “by introducing a suspension of phosphor particles into a carrier (e.g., silicone), encapsulating the LEDs in the carrier, and curing the carrier to provide a solid layer of material in which the phosphor particles will remain suspended.” ’465 Patent at 1:37-41.

34. One problem present in the prior art was that “silicone is a poor thermal conductor, and when illuminated, phosphors generate heat. Thus, when a phosphor-coated LED with a cured

silicone carrier is used in a high-power application, the cured silicone may crack and/or have a reduced lifetime. This property limits their use in high power LED applications which use temperature sensitive phosphor. Further, cracks in the phosphor and silicone composition reduce the efficiency of the device.” *Id.* at 1:41-45.

35. The inventions claimed by the ’465 Patent addressed these limitations by, e.g., separating the phosphor bearing film from the cured silicone film, such that the cured silicone film was substantially free of phosphor. As a result, the ’465 Patent offered advantages of, *inter alia*, simplifying the process for applying phosphor material to LEDs, as well as increasing the reliability and efficiency of phosphor material encapsulated LEDs.

U.S. Patent No. 8,143,769

36. U.S. Patent No. 8,143,769 (the “’769 Patent”) is titled “Light Emitting Diode (LED) Lighting Device” and was issued on March 27, 2012. A true and correct copy of the ’769 Patent is attached as Exhibit D.

37. The ’769 Patent was filed on September 8, 2008 as U.S. Patent Application No. 12/206,347.

38. Plaintiff is the owner of all rights, title, and interest in and to the ’769 Patent, with the full and exclusive right to bring suit to enforce the ’769 Patent, including the right to recover for past infringement.

39. The ’769 Patent is valid and enforceable under United States Patent Laws. The ’769 Patent recognized problems with existing light emitting diode based light devices.

40. The inventors of the ’769 Patent recognized that traditional prior art LED lighting devices needed adequate heat dissipation. As one example given by the inventors of the ’769 Patent, “compact devices that can be used as direct replacements for incandescent bulbs” need

proper heat dissipation to prevent the LEDs used from overheating. *See, e.g., id.* at 1:63-2:2. In this regard, the '769 Patent recognized that “in an arrangement that does not include a central cavity and in which the LEDs are arranged as an array, heat generated by LEDs at the center of the array will have a longer thermal conduction path to a heat emitting surface than that of heat generated by devices at the edges of the array, resulting in lower heat sink performance for LEDs at the center of the array.” *See, e.g.,* '769 Patent at 3:52-58. Further, the '769 Patent emphasized that the “at least one passage passing through the body from the cavity to an outer surface of the body and configured such that in operation air moves through the at least one cavity by thermal convection... can (i) increase the heat emitting surface area of the body by up to about 30%; (ii) reduce a variation in the heat sink performance of each LED and (iii) increase heat dissipation by 15 to 25%.” *See, e.g.,* '769 Patent at 3:41-48. Thus, the invention described and claimed in the '769 Patent provides the advantages of, *inter alia*, increased thermal efficiency, heat dissipation, and heatsink performance over the prior art.

U.S. Patent No. 8,567,988

41. U.S. Patent No. 8,567,988 (the “'988 Patent”) is titled “Efficient LED array” and was issued on October 29, 2013. A true and correct copy of the '988 Patent is attached as Exhibit E.

42. The '988 Patent was filed on September 29, 2008 as U.S. Patent Application No. 12/240,011.

43. Plaintiff is the owner of all rights, title, and interest in and to the '988 Patent, with the full and exclusive right to bring suit to enforce the '988 Patent, including the right to recover for past infringement.

44. The '988 Patent is valid and enforceable under United States Patent Laws. The '988 Patent recognized problems with existing light emitting device arrays at the time of its invention.

45. The inventors of the '988 Patent recognized that traditional prior art LED arrays were complicated to manufacture and resulted in inefficient heat dissipation, which in turn lowered light output by the LED array. In this regard, the '988 Patent recognized that “directly mounting the LED chips to a metal substrate without an insulting dielectric provided an efficient thermal path to reduce or minimize the degrading effects of heat on light output.” *See, e.g.*, '988 Patent at 4:54-59. The '988 Patent also recognized that by spacing the LED chips apart from each other and making the surface of the metal substrate reflective, the regions between the chips operate to reflect light thereby increasing the optical output of the LED array. *See, e.g., id.* at 6:10-17. Thus, the invention described and claimed in the '988 Patent provides the advantages of, *inter alia*, increased thermal efficiency and increased light output over the prior art.

U.S. Patent No. 10,966,300

46. U.S. Patent No. 10,966,300 (the “'300 Patent”) is titled “Light sources utilizing segmented LEDs to compensate for manufacturing variations in the light output of individual segmented LEDs” and was issued on March 30, 2021. A true and correct copy of the '300 Patent is attached as Exhibit F.

47. The '300 Patent was filed on June 21, 2019 as U.S. Patent Application Serial No. 16/449,220 and has a priority date of February 26, 2009.

48. Plaintiff is the owner of all rights, title, and interest in and to the '300 Patent, with the full and exclusive right to bring suit to enforce the '300 Patent, including the right to recover for past infringement.

49. The '300 Patent is valid and enforceable under United States Patent Laws.

50. The '300 Patent recognized and provided solutions to problems arising with LEDs' replacement of conventional light emitting devices such as incandescent and fluorescent lights. '300 Patent at 1:26-32.

51. For instance, the '300 Patent recognized that the dissipation of heat due to the conversion efficiency of the LEDs places a limit on the power level at which an LED operates. The '300 Patent also recognized that, due to the increased current running through the LED, higher light output of the LEDs would lead to a decrease in conversion efficiency as well as an overall decrease in the lifetime of the LED. *Id.* at 1:41-61. A light source with a typical single LED does not produce sufficient light for most applications and, in general, "there is a limit to the light per unit area of LED that can be practically generated at an acceptable power conversion efficiency." *Id.* at 1:62-2:8. In this respect, LED light sources have been designed to use multiple LEDs wired in parallel to avoid numerous cost disadvantages and increased failure rates associated with connecting the LEDs in a series-type connection or by making larger LEDs. *Id.* at 2:9-3:31.

52. The inventors of the '300 Patent addressed these limitations by utilizing "a single LED die that is divided into N segments that are serially connected to one another." *Id.* at 4:29-42. In this respect, the '300 Patent comprises, in one embodiment, a plurality of segmented LEDs connected in parallel between two power rails where the segmented LEDs are serially connected in segments having equal area thus providing an improved, less expensive, and longer-lasting light emitting device. *Id.* at 4:29-45; 10:64-11:5; abstract.

53. In view of the foregoing limitations of the prior art, the inventions claimed in the '300 Patent provide improved overall efficiency and life of the light source and "the ability to provide a light source that operates from a significantly higher potential than conventional LEDs while breaking up the light source into sufficient component light sources to compensate for the

variability in light generation between the various component light sources.” *See, e.g., id.* at 7:37-43.

COUNT I: INFRINGEMENT OF U.S. PATENT NO. 6,869,812

54. Plaintiff incorporates by reference and re-alleges paragraphs 1-54 of the Complaint as if fully set forth herein.

55. Defendant has infringed and is infringing, either literally or under the doctrine of equivalents, the '812 Patent in violation of 35 U.S.C. § 271 et seq., directly and/or indirectly, by making, using, offering for sale, and/or selling in the United States, and/or importing into the United States without authority or license products, including but not limited to the Current Lighting Compass CU2 and Current Lighting SGD Sling Dusk-to-Dawn among other substantially similar products (collectively, the “'812 Accused Products”).

56. By way of non-limiting example(s), set forth below (with claim language in bold and italics) is exemplary evidence of infringement of claim 1 of the '812 Patent by the '812 Accused Products. This description is based on publicly available information. Plaintiff reserves the right to modify this description, including, for example, on the basis of information about the '812 Accused Products that it obtains during discovery.

57. ***1(a): A light emitting diode chip comprising:***— The Current Lighting Compass CU2 and Current Lighting SGD Sling Dusk-to-Dawn each comprise a “light emitting diode chip,” as recited in claim 1:

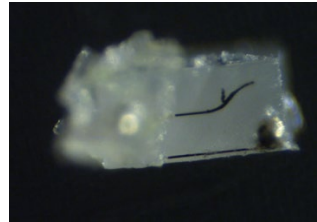
Current Lighting Compass CU2



Product Box



LED Package



LED Chip

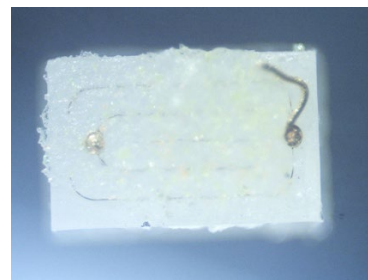
Current Lighting SGD Sling Dusk-to-Dawn



Product Box

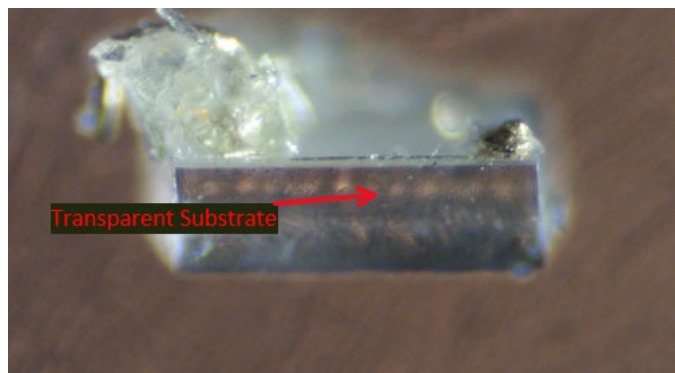


LED Package

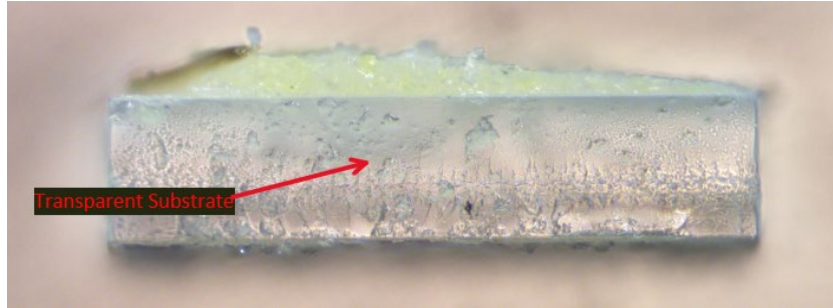


LED Chip

58. ***1(b): a substantially transparent substrate;***— The Current Lighting Compass CU2 and Current Lighting SGD Sling Dusk-to-Dawn each comprise a “substantially transparent substrate,” as seen in the below images where the transparent substrate is annotated in red:

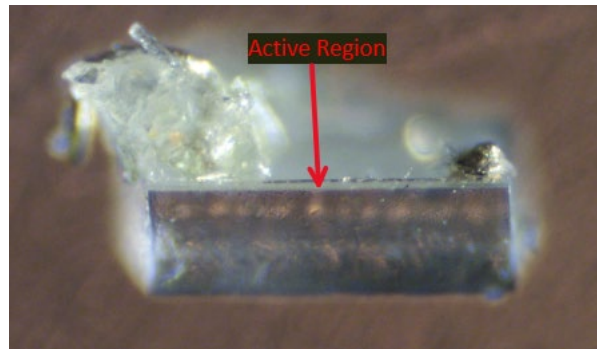


Current Lighting Compass CU2

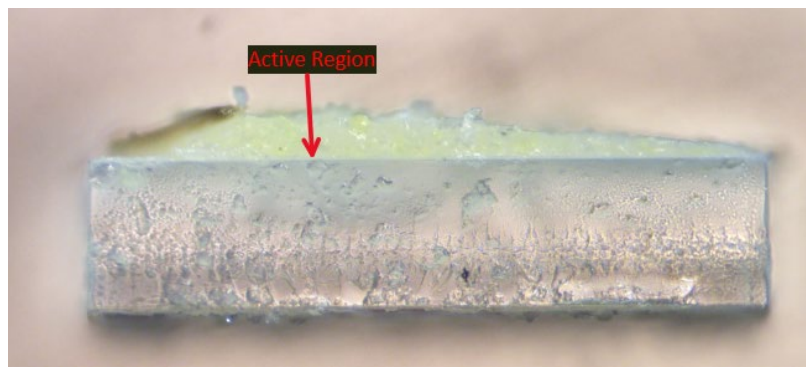


Current Lighting SGD Sling Dusk-to-Dawn

1(c): An active region formed upon the substrate; and;— The Current Lighting Compass CU2 and Current Lighting SGD Sling Dusk-to-Dawn each comprise an “active region formed upon the substrate,” as seen in the below images:



Current Lighting Compass CU2

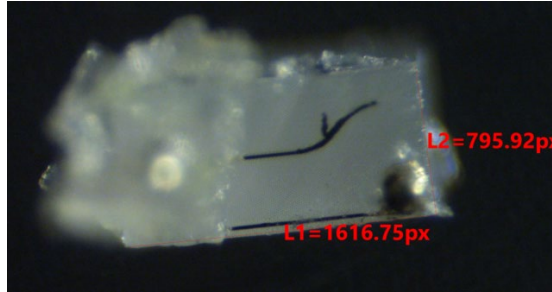


Current Lighting SGD Sling Dusk-to-Dawn

1(d): Wherein an aspect ratio of the active area is greater than approximately 1.5 to 1.—

The Current Lighting Compass CU2 and Current Lighting SGD Sling Dusk-to-Dawn each comprise an active region wherein the aspect ratio is greater than approximately 1.5 to 1.

Current Lighting Compass CU2



Current Lighting SGD Sling Dusk-to-Dawn



The aspect ratios of the active region of the light emitting diode chip in the Current Lighting Compass CU2 and Current Lighting SGD Sling Dusk-to-Dawn are all greater than 1.5 to 1. Specifically, the aspect ratios, as derived from the pixel (px) measurements taken from above images, are:

	L1 (long side)	L2	Aspect Ratio (L1/L2)
Current Lighting Compass CU2	1616.75	795.92	2.031
Current Lighting SGD Sling Dusk-to-Dawn	3633.92	2278.17	1.528

59. Additionally, Defendant has been and/or currently is an active inducer of infringement of the '812 Patent under 35 U.S.C. § 271(b) and a contributory infringer of the '812 Patent under 35 U.S.C. § 271(c).

60. Indeed, Defendant has been and/or currently is intentionally causing, urging, and/or encouraging customers to directly infringe one or more claims of the '812 Patent while being on notice of (or willfully blind to) the '812 Patent. For instance, Defendant has supplied and continues to supply the '812 Accused Products to customers (e.g., end users and/or distributors of the '812 Accused Products) while knowing that use of these products in their intended manner will directly infringe one or more claims of the '812 Patent.

61. Defendant has been and/or currently is knowingly and intentionally encouraging and aiding customers to engage in such direct infringement of the '812 Patent. As one example, Defendant promotes, advertises, and instructs customers or potential customers about the '812 Accused Products and uses of the '812 Accused Products. *See, e.g.,* <https://www.currentlighting.com/indoor-lighting/cu2/208945>; <https://www.currentlighting.com/outdoor-lighting/sgd-sling-dusk-dawn/4846985>.

62. Defendant knows (and/or has known) that such encouraging and aiding does (and/or would) result in their customers directly infringing the '812 Patent. For instance, Defendant knows (and/or has known) of the existence of the '812 Patent or at least should have known of the existence of the '812 Patent but was willfully blind to its existence. Indeed, Defendant has had actual knowledge of the '812 Patent since at least as early as June 14, 2022, when Defendant received Plaintiff's Notice Letter. And, as a result of their knowledge of the '812 Patent (and/or as a direct and probable consequence of its willful blindness to this fact), Defendant specifically intends (and/or has intended) that its encouraging and aiding does (and/or would) result in direct

infringement of the '812 Patent by Defendant's customers. On information and belief, Defendant specifically intends (and/or has intended) that its actions will (and/or would) result in direct infringement of one or more claims of the '812 Patent and/or subjectively believes (and/or has believed) that its actions will (and/or would) result in infringement of the '812 Patent but has taken (and/or took) deliberate actions to avoid learning of those facts.

63. Additionally, Defendant has been and/or currently is contributorily infringing one or more claims of the '812 Patent by offering for sale, selling, and/or importing one or more components in connection with the '812 Accused Products that contribute to the direct infringement of the '812 Patent by customers of the '812 Accused Products. As set forth above, Defendant has had actual knowledge of the '812 Patent or are willfully blind to its existence since at least as early as June 14, 2022, when Defendant received Plaintiff's Notice Letter. Further, Defendant offers for sale, sells, and/or imports one or more components in connection with the '812 Accused Products that are not staple articles of commerce suitable for substantial noninfringing use, and Defendant knows (or should know) that such component(s) are especially made or especially adapted for use in infringement of the '812 Patent. Defendant has supplied (and/or continues to supply) the '812 Accused Products that comprise such component(s) to customers, who then directly infringe one or more claims of the '812 Patent by using the '812 Accused Products in their intended manner (e.g., pursuant to instructions provided by Defendant).

64. At least as early as when Defendant received Plaintiff's Notice Letter, Defendant's infringement of the '812 Patent was and continues to be willful and deliberate, thereby entitling Plaintiff to enhanced damages.

65. Additional allegations regarding Defendant's knowledge of the '812 Patent and willful infringement will likely have evidentiary support after a reasonable opportunity for discovery.

66. Defendant's infringement of the '812 Patent is exceptional and entitles Plaintiff to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

67. Plaintiff is in compliance with any applicable marking and/or notice provisions of 35 U.S.C. § 287 with respect to the '812 Patent.

68. Plaintiff is entitled to recover from Defendant all damages that Plaintiff has sustained as a result of Defendant's infringement of the '812 Patent, including, without limitation, a reasonable royalty.

COUNT II: INFRINGEMENT OF U.S. PATENT NO. 7,901,109

69. Plaintiff incorporates by reference and re-alleges paragraphs 1-68 of the Complaint as if fully set forth herein.

70. Defendant has infringed and is infringing, either literally or under the doctrine of equivalents, the '109 Patent in violation of 35 U.S.C. § 271 et seq., directly and/or indirectly, by making, using, offering for sale, and/or selling in the United States, and/or importing into the United States without authority or license products, including but not limited to the Current Lighting LED HID Type B Bulb, Current Lighting Evolve EFH Floodlight, Current Lighting Evolve ERL1 Roadway Light, Current Lighting Evolve EWLS Wall Pack, and Current Lighting SGD Sling Dusk-to-Dawn among other substantially similar products (collectively, the "'109 Accused Products").

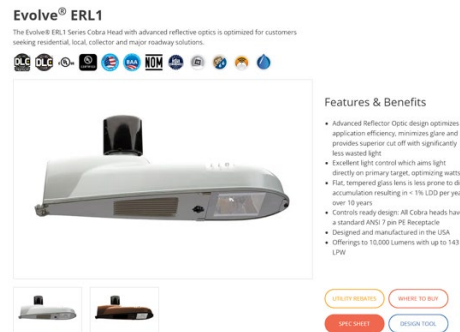
71. By way of non-limiting example(s), set forth below (with claim language in bold and italics) is exemplary evidence of infringement of claim 10 of the '109 Patent. This description

is based on publicly available information. Plaintiff reserves the right to modify this description, including, for example, on the basis of information about the '109 Accused Products that it obtains during discovery.

72. **10(a): A solid state light assembly, comprising:**—The Current Lighting Evolve EFH Floodlight and Current Lighting Evolve ERL1 Roadway Light are solid state light assemblies.

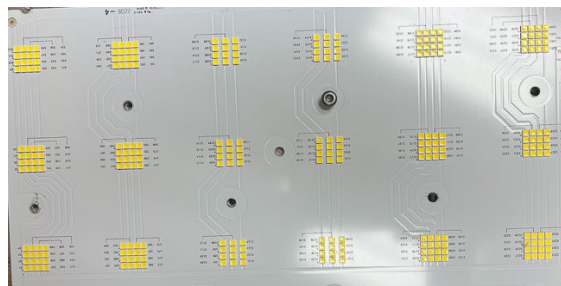


Current Lighting Evolve EFH Floodlight



Current Lighting Evolve ERL1 Roadway Light

10(b): a solid state light; and— The Current Lighting Evolve EFH Floodlight and Current Lighting Evolve ERL1 Roadway Light comprise solid state lights.



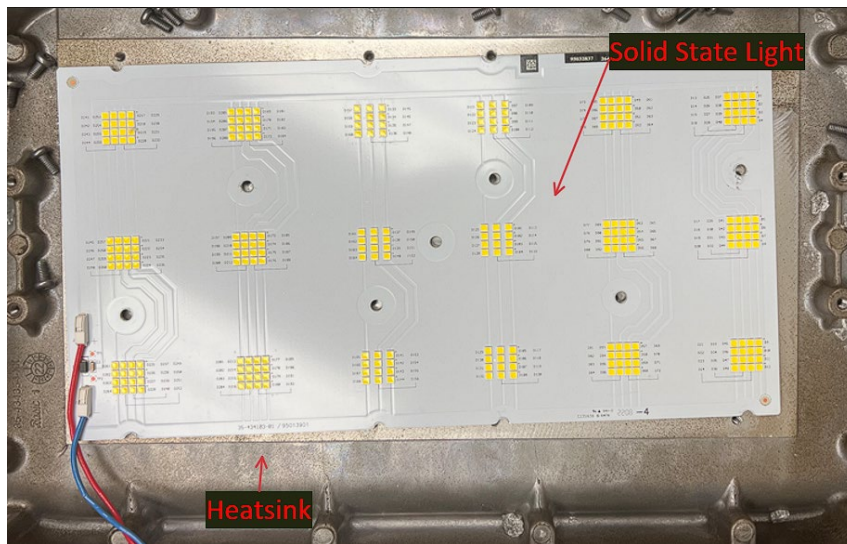
Current Lighting Evolve EFH Floodlight



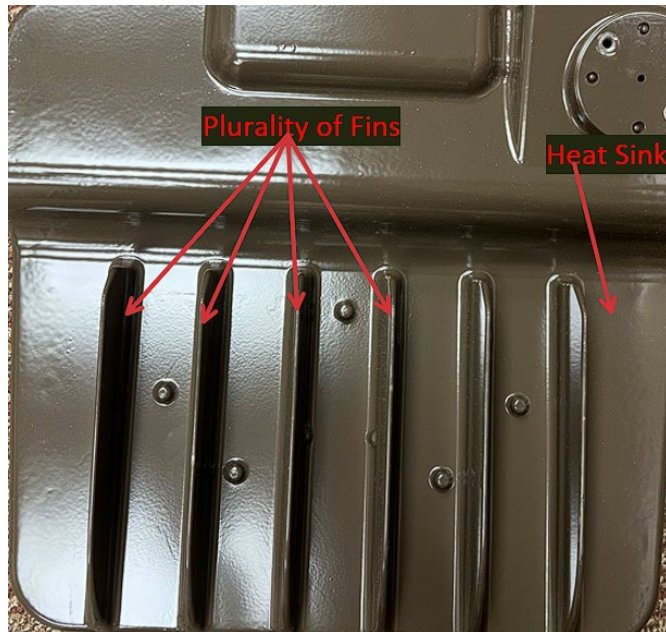
Current Lighting Evolve ERL1 Roadway Light

73. *10(c): a heat sink integrally affixed to the solid state light, the heat sink comprising at least one fin for dissipating heat generated by the solid state light.*

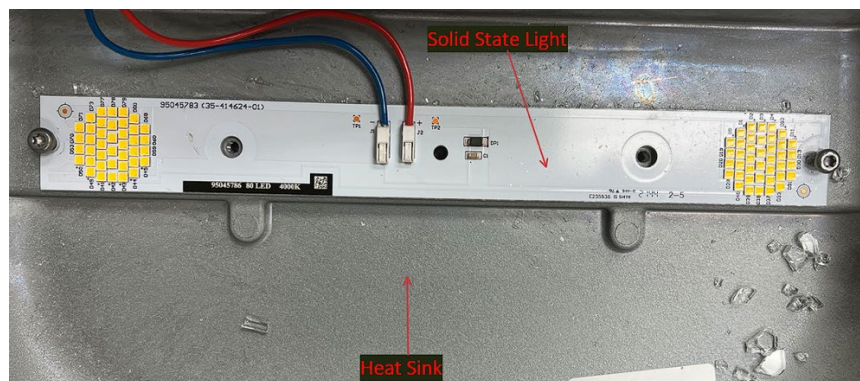
The Current Lighting Evolve EFH Floodlight has a heat sink integrally affixed to the solid state light:



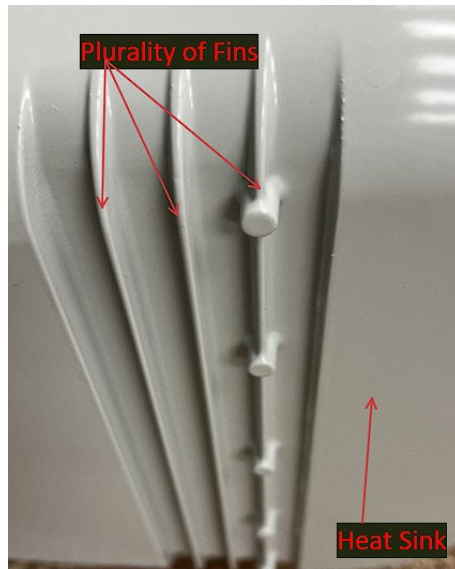
This heat sink comprises a plurality of fins for dissipating heat generated by the solid state light:



The Current Lighting Evolve ERL1 Roadway Light has a heat sink integrally affixed to the solid state light:



This heat sink comprises a plurality of fins for dissipating heat generated by the solid state light:



74. Additionally, Defendant has been and/or currently is an active inducer of infringement of the '109 Patent under 35 U.S.C. § 271(b) and a contributory infringer of the '109 Patent under 35 U.S.C. § 271(c).

75. Indeed, Defendant has been and/or currently is intentionally causing, urging, and/or encouraging customers to directly infringe one or more claims of the '109 Patent while being on notice of (or willfully blind to) the '109 Patent. For instance, Defendant has supplied and continues to supply the '109 Accused Products to customers (e.g., end users and/or distributors of the '109 Accused Products) while knowing that use of these products in their intended manner will directly infringe one or more claims of the '109 Patent.

76. Defendant has been and/or currently is knowingly and intentionally encouraging and aiding customers to engage in such direct infringement of the '109 Patent. As one example, Defendant promotes, advertises, and instructs customers or potential customers about the '109 Accused Products and uses of the '109 Accused Products. *See, e.g.,* <https://www.gecurrent.com/outdoor-lighting/led-flood-lighting/evolve-efh>; <https://www.gecurrent.com/outdoor-lighting/led-roadway-street-lights/evolve-erl1>.

77. Defendant knows (and/or has known) that such encouraging and aiding does (and/or would) result in their customers directly infringing the '109 Patent. For instance, Defendant knows (and/or has known) of the existence of the '109 Patent or at least should have known of the existence of the '109 Patent but was willfully blind to its existence. Indeed, Defendant has had actual knowledge of the '109 Patent since at least as early as June 14, 2022, when Defendant received Plaintiff's Notice Letter. And, as a result of their knowledge of the '109 Patent (and/or as a direct and probable consequence of its willful blindness to this fact), Defendant specifically intends (and/or has intended) that its encouraging and aiding does (and/or would) result in direct infringement of the '109 Patent by Defendant's customers. On information and belief, Defendant specifically intends (and/or has intended) that its actions will (and/or would) result in direct infringement of one or more claims of the '109 Patent and/or subjectively believes (and/or has believed) that its actions will (and/or would) result in infringement of the '109 Patent but has taken (and/or took) deliberate actions to avoid learning of those facts.

78. Additionally, Defendant has been and/or currently is contributorily infringing one or more claims of the '109 Patent by offering for sale, selling, and/or importing one or more components in connection with the '109 Accused Products that contribute to the direct infringement of the '109 Patent by customers of the '109 Accused Products. In particular, as set forth above, Defendant has had actual knowledge of the '109 Patent or are willfully blind to its existence since at least as early as June 14, 2022, when Defendant received Plaintiff's Notice Letter. Further, Defendant offers for sale, sells, and/or imports one or more components in connection with the '109 Accused Products that are not staple articles of commerce suitable for substantial noninfringing use, and Defendant knows (or should know) that such component(s) are especially made or especially adapted for use in infringement of the '109 Patent. Defendant has

supplied (and/or continues to supply) the '109 Accused Products that comprise such component(s) to customers, who then directly infringe one or more claims of the '109 Patent by using the '109 Accused Products in their intended manner (e.g., pursuant to instructions provided by Defendant).

79. At least as early as the filing and/or service of this Complaint, Defendant's infringement of the '109 Patent was and continues to be willful and deliberate, thereby entitling Plaintiff to enhanced damages.

80. Additional allegations regarding Defendant's knowledge of the '109 Patent and willful infringement will likely have evidentiary support after a reasonable opportunity for discovery.

81. Defendant's infringement of the '109 Patent is exceptional and entitles Plaintiff to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

82. Plaintiff is in compliance with any applicable marking and/or notice provisions of 35 U.S.C. § 287 with respect to the '109 Patent.

83. Plaintiff is entitled to recover from Defendant all damages that Plaintiff has sustained as a result of Defendant's infringement of the '109 Patent, including, without limitation, a reasonable royalty.

COUNT III: INFRINGEMENT OF U.S. PATENT NO. 7,973,465

84. Plaintiff incorporates by reference and re-alleges 1-83 of the Complaint as if fully set forth herein.

85. Defendant has infringed and is infringing, either literally or under the doctrine of equivalents, the '465 Patent in violation of 35 U.S.C. § 271 et seq., directly and/or indirectly, by making, using, offering for sale, and/or selling in the United States, and/or importing into the United States without authority or license, products, including but not limited to the Current

Lighting Lumination LBT, Current Lighting Albeo ABV, Current Lighting LED HID Type B Bulb, Current Lighting Evolve EFH Floodlight, Current Lighting Evolve ERL1 Roadway Light, and Current Lighting Evolve EWLS Wall Pack, among other substantially similar products (collectively, the “’465 Accused Products”).

86. As non-limiting examples, set forth below (with claim language in bold and italics) is exemplary evidence of infringement of claim 1 of the ’465 Patent. This description is based on publicly available information. Plaintiff reserves the right to modify this description, including, for example, on the basis of information about the ’465 Accused Products that it obtains during discovery.

87. ***1(a): An apparatus comprising: A light emitting device;***—The Current Lighting Lumination LBT and Current Lighting Albeo ABV are apparatuses containing LEDs.

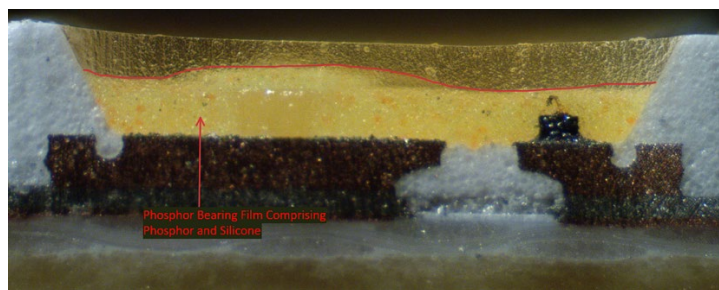


Current Lighting Lumination LBT

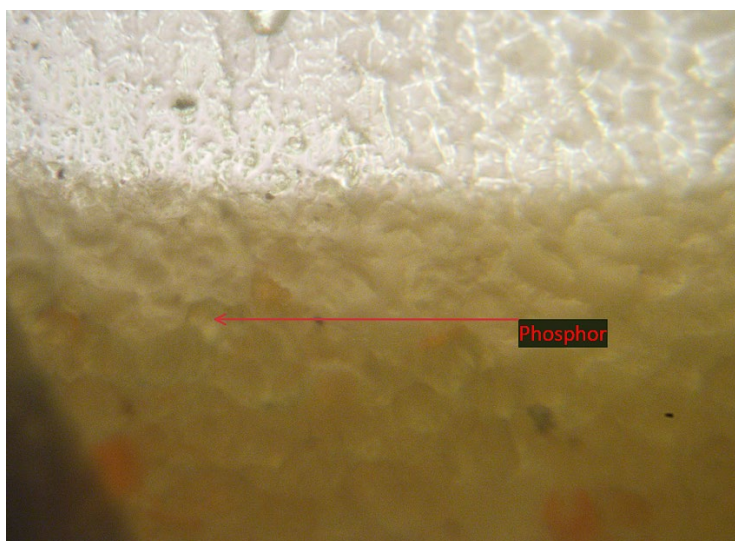


Current Lighting Albeo ABV

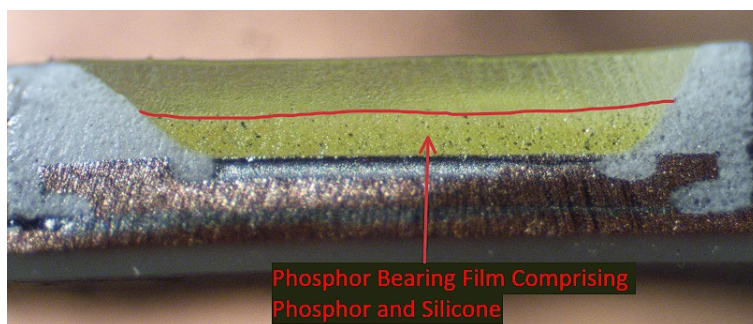
88. ***1(b): a phosphor bearing film arranged with the light emitting device, the phosphor bearing film comprising phosphor and a silicone carrier; and***—The below images of an individual LED from the above ’465 Accused Products are annotated to illustrate the phosphor bearing film comprising phosphor and a silicone carrier:



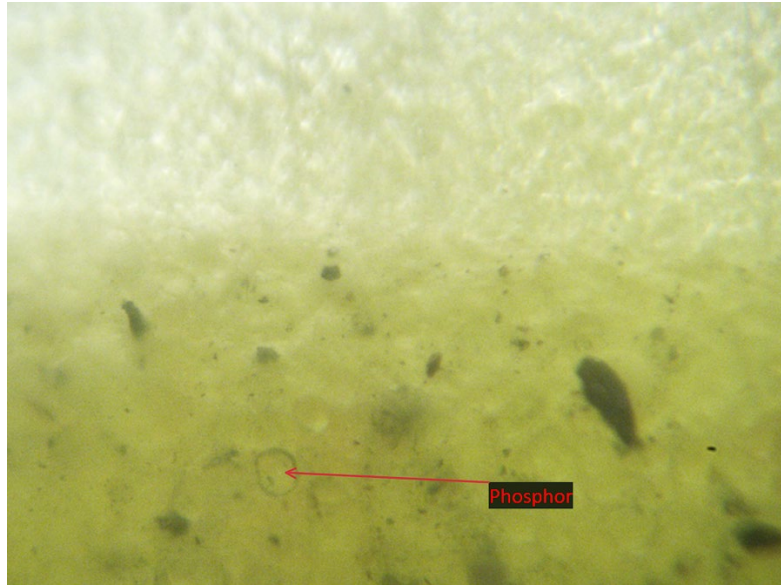
Current Lighting Lumination LBT



Current Lighting Lumination LBT

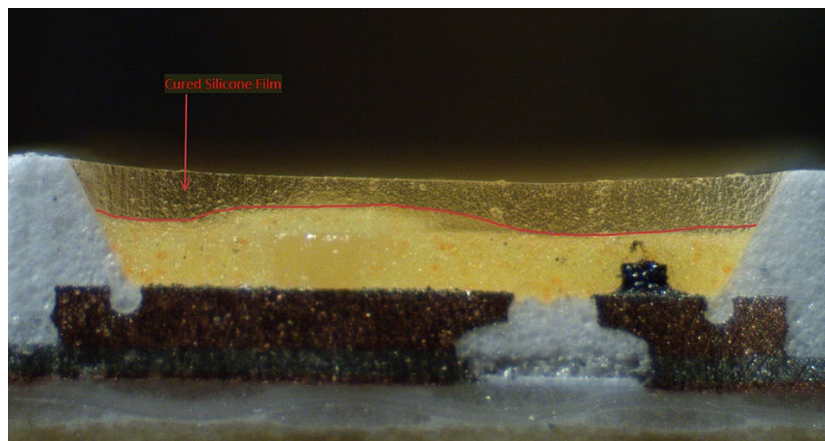


Current Lighting Albeo ABV

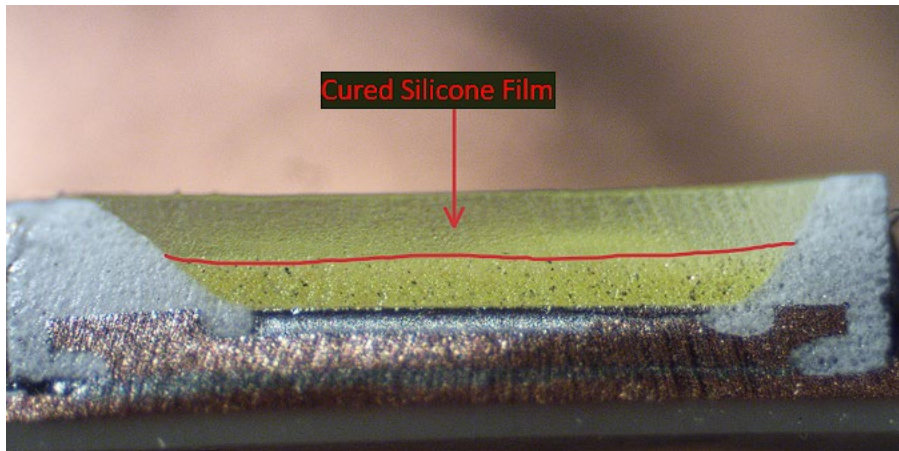


Current Lighting Albeo ABV

89. ***1(c): a cured silicone film on the phosphor bearing film, the cured silicone film being substantially free of phosphor.***—The below images of an individual LED from the above '465 Accused Products are annotated to illustrate the cured silicone film on top of the phosphor film, the cured silicone film being substantially free of the phosphor.



Current Lighting Lumination LBT



Current Lighting Albeo ABV

90. Additionally, Defendant has been and/or currently is an active inducer of infringement of the '465 Patent under 35 U.S.C. § 271(b) and a contributory infringer of the '465 Patent under 35 U.S.C. § 271(c).

91. Indeed, Defendant has been and/or currently is intentionally causing, urging, and/or encouraging customers to directly infringe one or more claims of the '465 Patent while being on notice of (or willfully blind to) the '465 Patent. For instance, Defendant has supplied and continues to supply the '465 Accused Products to customers (e.g., end users and/or distributors of the '465 Accused Products) while knowing that use of these products in their intended manner will directly infringe one or more claims of the '465 Patent.

92. Defendant has been and/or currently is knowingly and intentionally encouraging and aiding customers to engage in such direct infringement of the '465 Patent. As one example, Defendant promotes, advertises, and instructs customers or potential customers about the '465 Accused Products and uses of the '465 Accused Products. *See, e.g.*, <https://www.gecurrent.com/indoor-lighting/recessed/lumination-lbt>; <https://www.gecurrent.com/indoor-lighting/high-bay-led-lights/albeo-abv-led-luminaire>.

93. Defendant knows (and/or has known) that such encouraging and aiding does (and/or would) result in their customers directly infringing the '465 Patent. For instance, Defendant knows (and/or has known) of the existence of the '465 Patent or at least should have known of the existence of the '465 Patent but was willfully blind to its existence. Indeed, Defendant has had actual knowledge of the '465 Patent since at least as early as June 14, 2022, when Defendant received Plaintiff's Notice Letter . And, as a result of their knowledge of the '465 Patent (and/or as a direct and probable consequence of its willful blindness to this fact), Defendant specifically intends (and/or has intended) that its encouraging and aiding does (and/or would) result in direct infringement of the '465 Patent by Defendant's customers. On information and belief, Defendant specifically intends (and/or has intended) that its actions will (and/or would) result in direct infringement of one or more claims of the '465 Patent and/or subjectively believes (and/or has believed) that its actions will (and/or would) result in infringement of the '465 Patent but has taken (and/or took) deliberate actions to avoid learning of those facts.

94. Additionally, Defendant has been and/or currently is contributorily infringing one or more claims of the '465 Patent by offering for sale, selling, and/or importing one or more components in connection with the '465 Accused Products that contribute to the direct infringement of the '465 Patent by customers of the '465 Accused Products. In particular, as set forth above, Defendant has had actual knowledge of the '465 Patent or are willfully blind to its existence since at least as early as June 14, 2022, when Defendant received Plaintiff's Notice Letter . Further, Defendant offers for sale, sells, and/or imports one or more components in connection with the '465 Accused Products that are not staple articles of commerce suitable for substantial noninfringing use, and Defendant knows (or should know) that such component(s) are especially made or especially adapted for use in infringement of the '465 Patent. Defendant has supplied

(and/or continues to supply) the '465 Accused Products that comprise such component(s) to customers, who then directly infringe one or more claims of the '465 Patent by using the '465 Accused Products in their intended manner (e.g., pursuant to instructions provided by Defendant).

95. At least as early as the filing and/or service of this Complaint, Defendant's infringement of the '465 Patent was and continues to be willful and deliberate, thereby entitling Plaintiff to enhanced damages.

96. Additional allegations regarding Defendant's knowledge of the '465 Patent and willful infringement will likely have evidentiary support after a reasonable opportunity for discovery.

97. Defendant's infringement of the '465 Patent is exceptional and entitles Plaintiff to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

98. Plaintiff is in compliance with any applicable marking and/or notice provisions of 35 U.S.C. § 287 with respect to the '465 Patent.

99. Plaintiff is entitled to recover from Defendant all damages that Plaintiff has sustained as a result of Defendant's infringement of the '465 Patent, including, without limitation, a reasonable royalty.

COUNT IV: INFRINGEMENT OF U.S. PATENT NO. 8,143,769

100. Plaintiff incorporates by reference and re-alleges 1-99 of the Complaint as if fully set forth herein.

101. Defendant has infringed and is infringing, either literally or under the doctrine of equivalents, the '769 Patent in violation of 35 U.S.C. § 271 et seq., directly and/or indirectly, by making, using, offering for sale, and/or selling in the United States, and/or importing into the United States without authority or license, products, including but not limited to the Current

Lighting LED HID Type B Bulb among other substantially similar products (collectively, the “’769 Accused Products”).

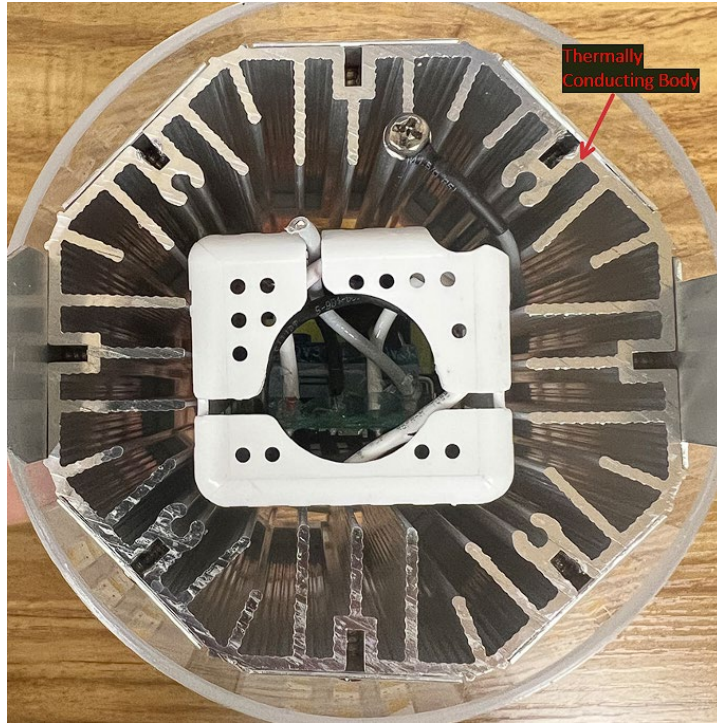
102. As just one non-limiting example, set forth below (with claim language in bold and italics) is exemplary evidence of infringement of claims 1 of the ’769 Patent. This description is based on publicly available information. Plaintiff reserves the right to modify this description, including, for example, on the basis of information about the ’769 Accused Products that it obtains during discovery.

103. ***1(a): A light emitting diode lighting device comprising:***—The Current Lighting LED HID Type B Bulb comprises an LED lighting device:



Current Lighting LED HID Type B Bulb

104. ***1(b): a thermally conducting body having at least one opening that connects with at least one cavity within the body, wherein the thermally conducting body is symmetric with a central axis;***—The LED lighting device of the Current Lighting LED HID Type B Bulb comprises a thermal conducting body that have an opening which connects with one cavity within the body. Further, the thermal conducting body is symmetric with a central axis, as seen in the annotated images below:





Cavity within body



The thermally conducting body is symmetric with a central axis.

Current Lighting LED HID Type B Bulb

105. *1(c): at least one passage passing through the body from the cavity to an outer surface of the body and configured such that in operation air moves through the at least one cavity by thermal convection thereby to provide cooling of the body; and—*The LED lighting device of the Current Lighting LED HID Type B Bulb comprises a passage that passes through the body from the cavity to an outer surface of the body and operates so that air moves through the cavity by thermal convection, as seen in the annotated images below:





Current Lighting LED HID Type B Bulb

106. *1(d): a plurality of heat radiating fins extending from an internal surface of the at least one passage and the cavity to aid in dissipation of heat.*—The LED lighting device of the Current Lighting LED HID Type B Bulb comprises a plurality of heat radiating fins that extend from an internal surface of the passage and cavity that aid in the dissipation of heat, as seen in the images below:



Current Lighting LED HID Type B Bulb

107. Additionally, Defendant has been and/or currently is an active inducer of infringement of the '769 Patent under 35 U.S.C. § 271(b) and a contributory infringer of the '769 Patent under 35 U.S.C. § 271(c).

108. Indeed, Defendant has been and/or currently is intentionally causing, urging, and/or encouraging customers to directly infringe one or more claims of the '769 Patent while being on notice of (or willfully blind to) the '769 Patent. For instance, Defendant has supplied and continues to supply the '769 Accused Products to customers (e.g., end users and/or distributors of the '769 Accused Products) while knowing that use of these products in their intended manner will directly infringe one or more claims of the '769 Patent.

109. Defendant has been and/or currently is knowingly and intentionally encouraging and aiding customers to engage in such direct infringement of the '769 Patent. As one example, Defendant promotes, advertises, and instructs customers or potential customers about the '769 Accused Products and uses of the '769 Accused Products. *See, e.g.,* <https://www.gecurrent.com/catalog/led-hid-type-b-ed235-lamps-22679>.

110. Defendant knows (and/or has known) that such encouraging and aiding does (and/or would) result in their customers directly infringing the '769 Patent. For instance, Defendant knows (and/or has known) of the existence of the '769 Patent or at least should have known of the existence of the '769 Patent but was willfully blind to its existence. Indeed, Defendant has had actual knowledge of the '769 Patent since at least as early as June 14, 2022, when Defendant received Plaintiff's Notice Letter. And, as a result of their knowledge of the '769 Patent (and/or as a direct and probable consequence of its willful blindness to this fact), Defendant specifically intends (and/or has intended) that its encouraging and aiding does (and/or would) result in direct infringement of the '769 Patent by Defendant's customers. On information and belief, Defendant specifically intends (and/or has intended) that its actions will (and/or would) result in direct infringement of one or more claims of the '769 Patent and/or subjectively believes (and/or has

believed) that its actions will (and/or would) result in infringement of the '769 Patent but has taken (and/or took) deliberate actions to avoid learning of those facts.

111. Additionally, Defendant has been and/or currently is contributorily infringing one or more claims of the '769 Patent by offering for sale, selling, and/or importing one or more components in connection with the '769 Accused Products that contribute to the direct infringement of the '769 Patent by customers of the '769 Accused Products. In particular, as set forth above, Defendant has had actual knowledge of the '769 Patent or are willfully blind to its existence since at least as early as June 14, 2022, when Defendant received Plaintiff's Notice Letter. Further, Defendant offers for sale, sells, and/or imports one or more components in connection with the '769 Accused Products that are not staple articles of commerce suitable for substantial noninfringing use, and Defendant knows (or should know) that such component(s) are especially made or especially adapted for use in infringement of the '769 Patent. Defendant has supplied (and/or continues to supply) the '769 Accused Products that comprise such component(s) to customers, who then directly infringe one or more claims of the '769 Patent by using the '769 Accused Products in their intended manner (e.g., pursuant to instructions provided by Defendant).

112. At least as early as the filing and/or service of this Complaint, Defendant's infringement of the '769 Patent was and continues to be willful and deliberate, thereby entitling Plaintiff to enhanced damages.

113. Additional allegations regarding Defendant's knowledge of the '769 Patent and willful infringement will likely have evidentiary support after a reasonable opportunity for discovery.

114. Defendant's infringement of the '769 Patent is exceptional and entitles Plaintiff to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

115. Plaintiff is in compliance with any applicable marking and/or notice provisions of 35 U.S.C. § 287 with respect to the '769 Patent.

116. Plaintiff is entitled to recover from Defendant all damages that Plaintiff has sustained as a result of Defendant's infringement of the '769 Patent, including, without limitation, a reasonable royalty.

COUNT V: INFRINGEMENT OF U.S. PATENT NO. 8,567,988

117. Plaintiff incorporates by reference and re-alleges paragraphs 1-116 of the Complaint as if fully set forth herein.

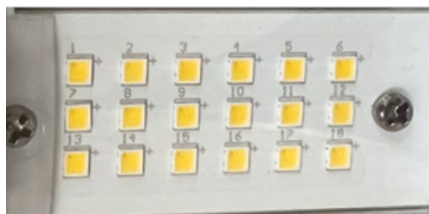
118. Defendant has infringed and is infringing, either literally or under the doctrine of equivalents, the '988 Patent in violation of 35 U.S.C. § 271 et seq., directly and/or indirectly, by making, using, offering for sale, and/or selling in the United States, and/or importing into the United States without authority or license, products, including but not limited to the Current Lighting Lumination LBT, Current Lighting Albeo ABV, Current Lighting LED HID Type B Bulb, Current Lighting Evolve EFH Floodlight, Current Lighting Evolve ERL1 Roadway Light, Current Lighting Evolve EWLS Wall Pack, and Current Lighting SGD Sling Dusk-to-Dawn among other substantially similar products (collectively, the "'988 Accused Products").

119. As just one non-limiting example, set forth below (with claim language in bold and italics) is exemplary evidence of infringement of claims 1 and 7 of the '988 Patent. This description is based on publicly available information. Plaintiff reserves the right to modify this description, including, for example, on the basis of information about the '988 Accused Products that it obtains during discovery.

120. ***1(a): A light emitting diode (LED) apparatus comprising:***—The Current Lighting Evolve EWLS Wall Pack and Current Lighting LED HID Type B Bulb each comprises an LED apparatus:



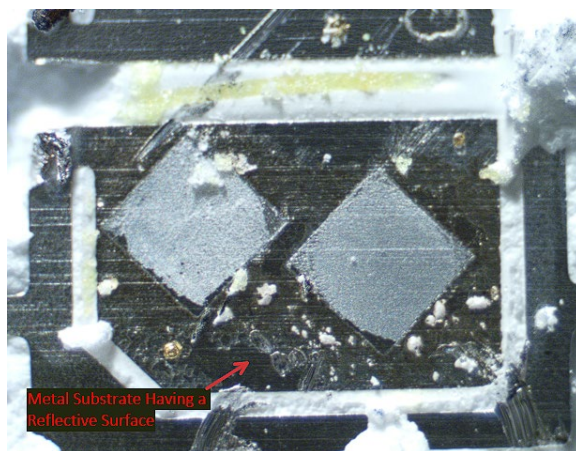
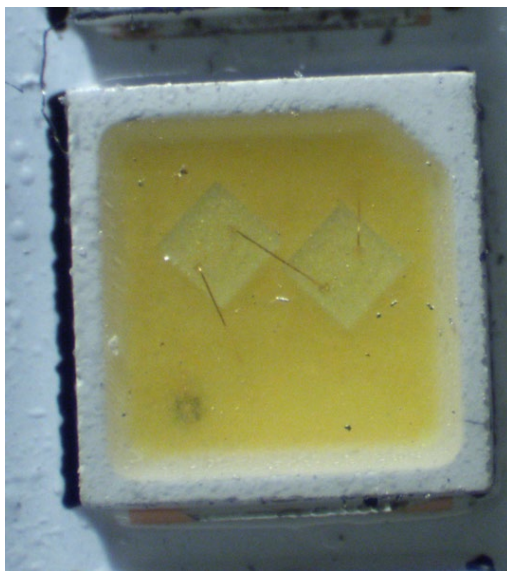
Current Lighting Evolve EWLS Wall Pack



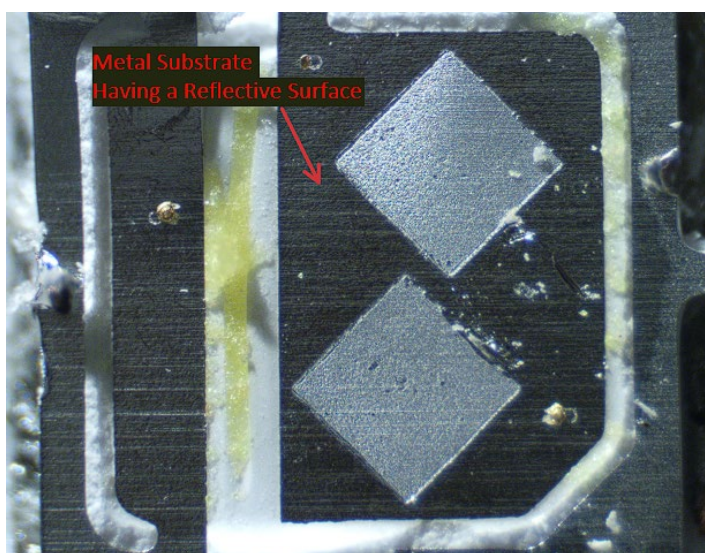
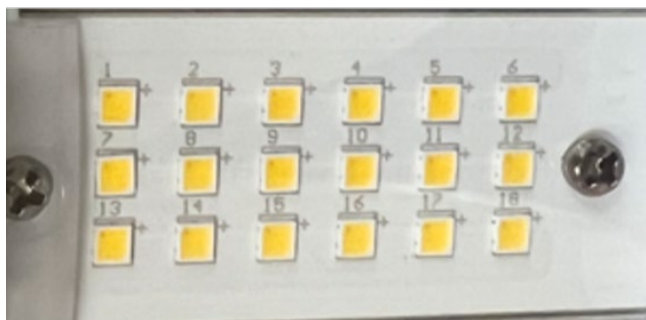
Current Lighting LED HID Type B Bulb

121. ***1(b): a metal substrate having a reflective surface; and:***—The LED apparatuses of the Current Lighting Evolve EWLS Wall Pack and Current Lighting LED HID Type B Bulb

each comprises a metal substrate having a reflective surface, as seen in the annotated images below:



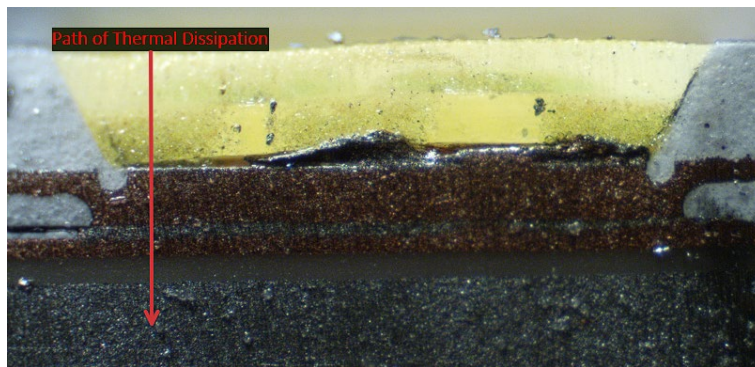
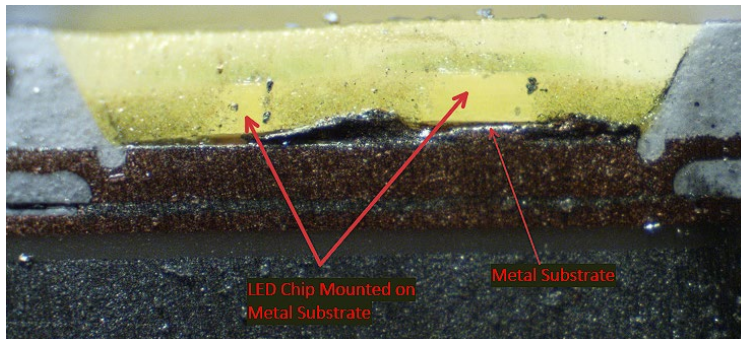
Current Lighting Evolve EWLS Wall Pack



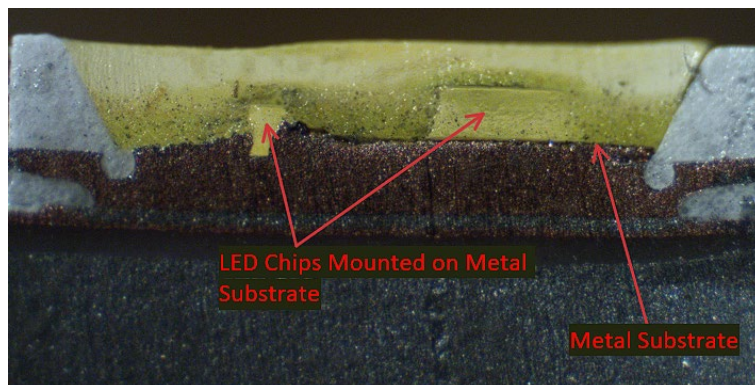
Current Lighting LED HID Type B Bulb

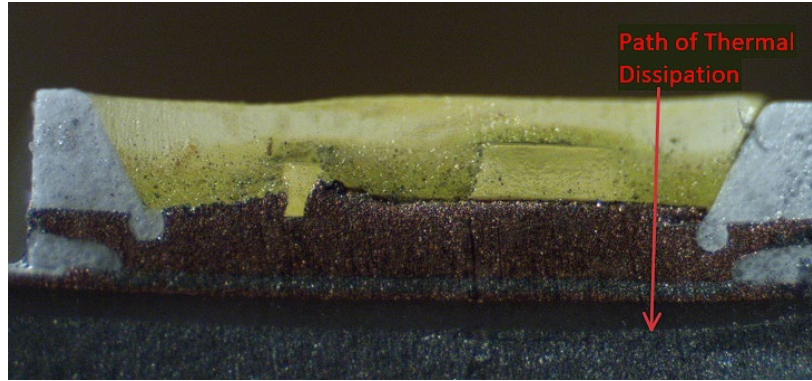
122. *1(c): a plurality of LED chips mounted directly to the reflective surface of the metal substrate creating an efficient thermal path and;*—The LED apparatuses of the Current Lighting Evolve EWLS Wall Pack and Current Lighting LED HID Type B Bulb each comprises

a plurality of LED chips mounted directly to the reflective surface of the metal substrate creating an efficient thermal path, as seen in the annotated images below.



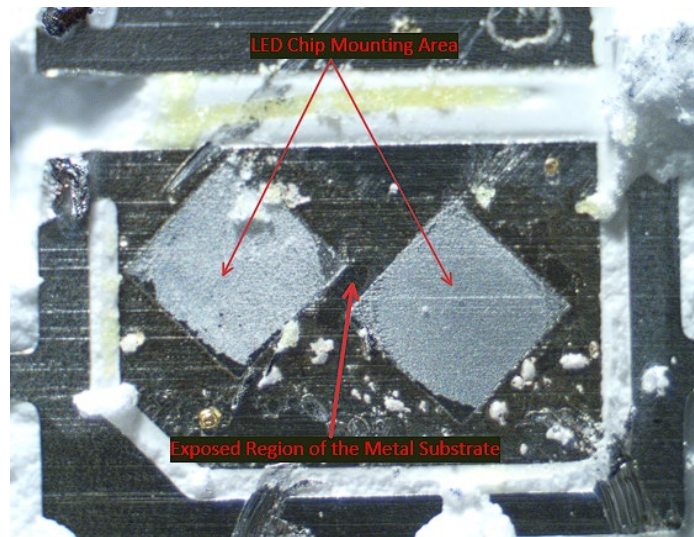
Current Lighting Evolve EWLS Wall Pack



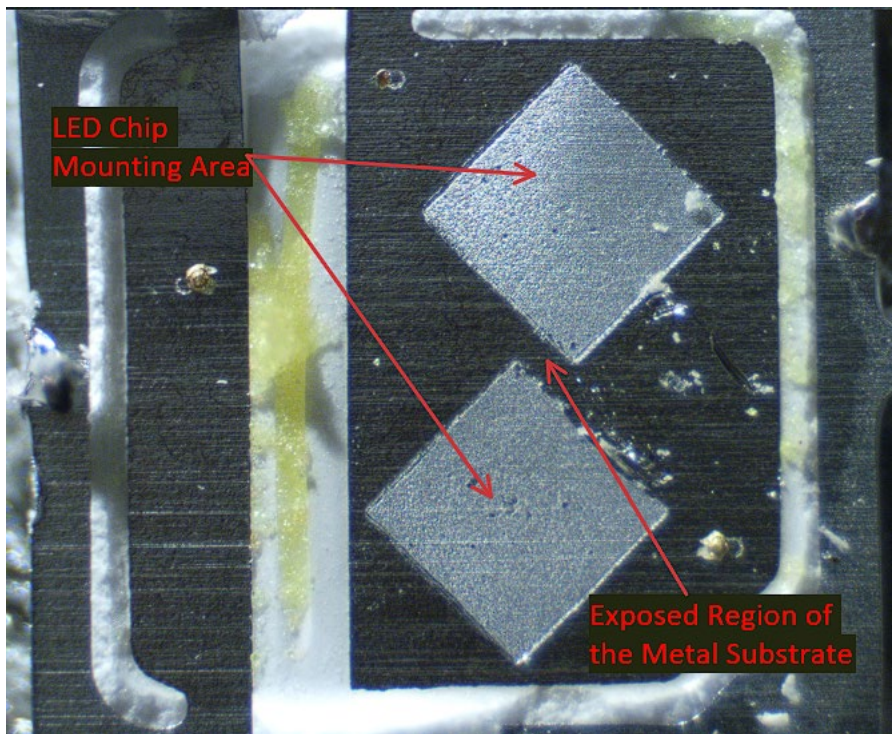


Current Lighting LED HID Type B Bulb

123. *1(d): at least a portion of the LED chips being spaced apart from each other to expose regions of the reflective surface between the portion of the LED chips, the exposed regions reflecting light emitted from the portion of the LED chips, and—*The LED chips in the Current Lighting Evolve EWLS Wall Pack and Current Lighting LED HID Type B Bulb are spaced apart from each other to expose regions of the reflective surface between the portion of the LED chips, the exposed regions reflecting light emitted from the portion of the LED chips, as seen in the images below.

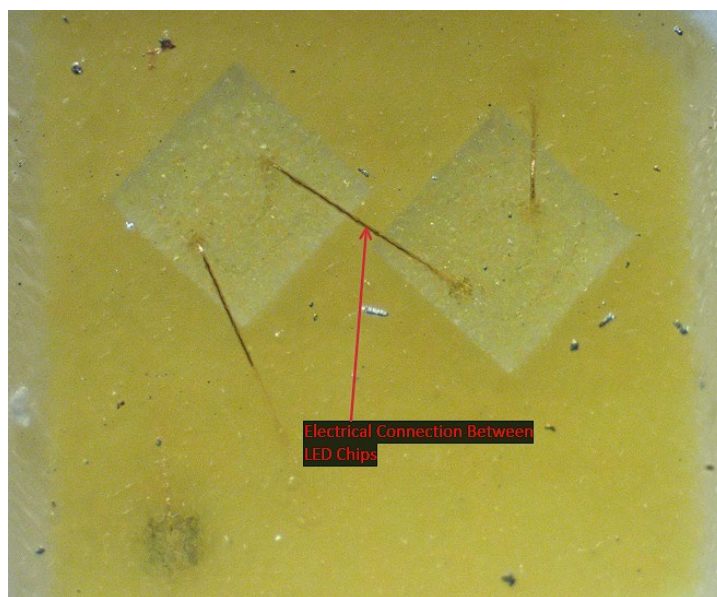


Current Lighting Evolve EWLS Wall Pack

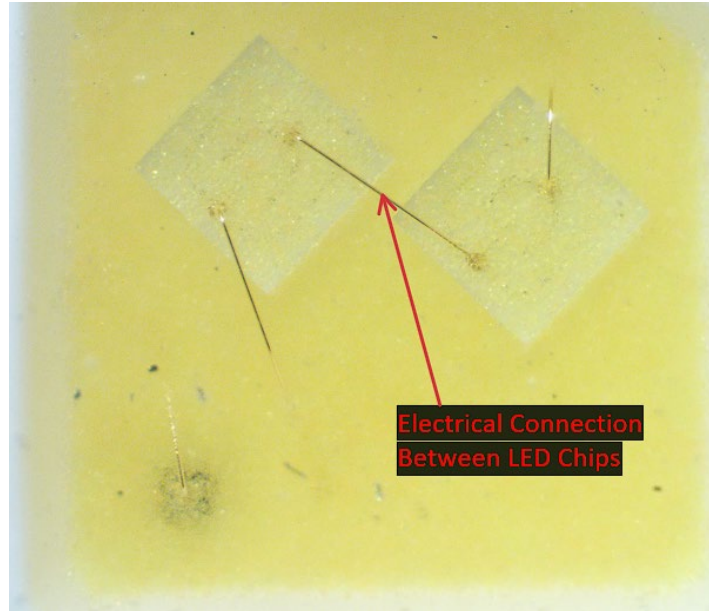


Current Lighting LED HID Type B Bulb

124. *1(e): an electrical path formed by connecting the LED chips in a chip to chip fashion*—An electrical path is formed by connecting the LED chips in a chip to chip fashion.

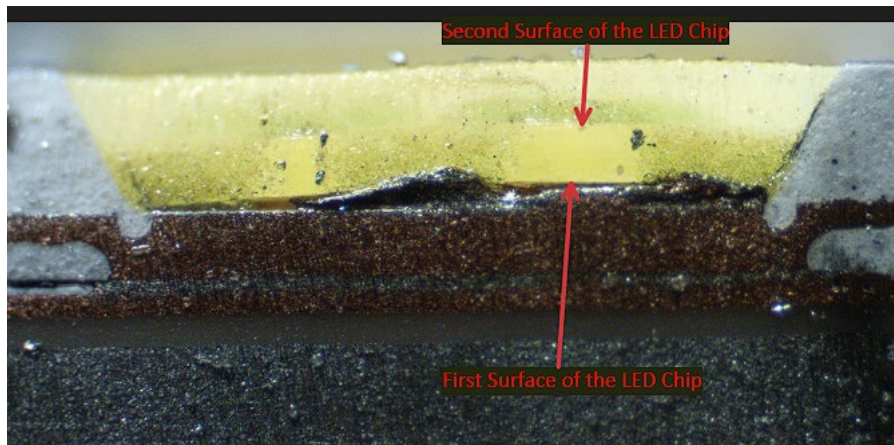


Current Lighting Evolve EWLS Wall Pack

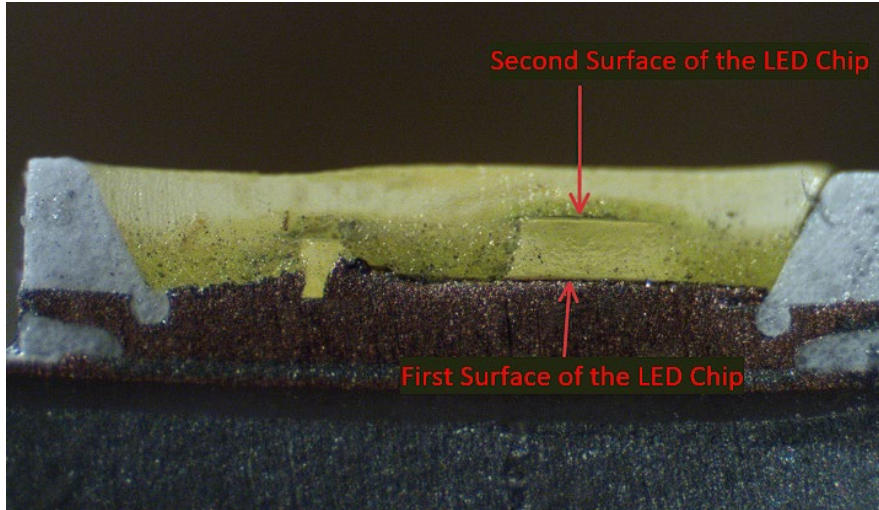


Current Lighting LED HID Type B Bulb

125. **Claim 7: The apparatus of claim 1 wherein the plurality of LED chips have a first surface that is mounted to the reflective surface, and electrical contacts that are provided on one or more surfaces that are not the first surface.**—The LED chips have electrical contacts which are provided on surfaces other than the one mounted to the reflective surface, as seen in the below images:



Current Lighting Evolve EWLS Wall Pack



Current Lighting LED HID Type B Bulb

126. Additionally, Defendant has been and/or currently is an active inducer of infringement of the '988 Patent under 35 U.S.C. § 271(b) and a contributory infringer of the '988 Patent under 35 U.S.C. § 271(c).

127. Indeed, Defendant has been and/or currently is intentionally causing, urging, and/or encouraging customers to directly infringe one or more claims of the '988 Patent while being on notice of (or willfully blind to) the '988 Patent. For instance, Defendant has supplied and continues to supply the '988 Accused Products to customers (e.g., end users and/or distributors of the '988 Accused Products) while knowing that use of these products in their intended manner will directly infringe one or more claims of the '988 Patent.

128. Defendant has been and/or currently is knowingly and intentionally encouraging and aiding customers to engage in such direct infringement of the '988 Patent. As one example, Defendant promotes, advertises, and instructs customers or potential customers about the '988 Accused Products and uses of the '988 Accused Products. *See, e.g.,*

<https://www.gecurrent.com/outdoor-lighting/wall-mount/evolve-ewls;>

[https://www.gecurrent.com/catalog/led-hid-type-b-ed235-lamps-22679.](https://www.gecurrent.com/catalog/led-hid-type-b-ed235-lamps-22679)

129. Defendant knows (and/or has known) that such encouraging and aiding does (and/or would) result in their customers directly infringing the '988 Patent. For instance, Defendant knows (and/or has known) of the existence of the '988 Patent or at least should have known of the existence of the '988 Patent but was willfully blind to its existence. Indeed, Defendant has had actual knowledge of the '988 Patent since at least as early as June 14, 2022, when Defendant received Plaintiff's Notice Letter. And, as a result of their knowledge of the '988 Patent (and/or as a direct and probable consequence of its willful blindness to this fact), Defendant specifically intends (and/or has intended) that its encouraging and aiding does (and/or would) result in direct infringement of the '988 Patent by Defendant's customers. On information and belief, Defendant specifically intends (and/or has intended) that its actions will (and/or would) result in direct infringement of one or more claims of the '988 Patent and/or subjectively believes (and/or has believed) that its actions will (and/or would) result in infringement of the '988 Patent but has taken (and/or took) deliberate actions to avoid learning of those facts.

130. Additionally, Defendant has been and/or currently is contributorily infringing one or more claims of the '988 Patent by offering for sale, selling, and/or importing one or more components in connection with the '988 Accused Products that contribute to the direct infringement of the '988 Patent by customers of the '988 Accused Products. In particular, as set forth above, Defendant has had actual knowledge of the '988 Patent or are willfully blind to its existence since at least as early as June 14, 2022, when Defendant received Plaintiff's Notice Letter. Further, Defendant offers for sale, sells, and/or imports one or more components in connection with the '988 Accused Products that are not staple articles of commerce suitable for

substantial noninfringing use, and Defendant knows (or should know) that such component(s) are especially made or especially adapted for use in infringement of the '988 Patent. Defendant has supplied (and/or continues to supply) the '988 Accused Products that comprise such component(s) to customers, who then directly infringe one or more claims of the '988 Patent by using the '988 Accused Products in their intended manner (e.g., pursuant to instructions provided by Defendant).

131. At least as early as the filing and/or service of this Complaint, Defendant's infringement of the '988 Patent was and continues to be willful and deliberate, thereby entitling Plaintiff to enhanced damages.

132. Additional allegations regarding Defendant's knowledge of the '988 Patent and willful infringement will likely have evidentiary support after a reasonable opportunity for discovery.

133. Defendant's infringement of the '988 Patent is exceptional and entitles Plaintiff to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

134. Plaintiff is in compliance with any applicable marking and/or notice provisions of 35 U.S.C. § 287 with respect to the '988 Patent.

135. Plaintiff is entitled to recover from Defendant all damages that Plaintiff has sustained as a result of Defendant's infringement of the '988 Patent, including, without limitation, a reasonable royalty.

COUNT VI: INFRINGEMENT OF U.S. PATENT NO. 10,966,300

136. Plaintiff incorporates by reference and re-alleges paragraphs 1-135 of the Complaint as if fully set forth herein.

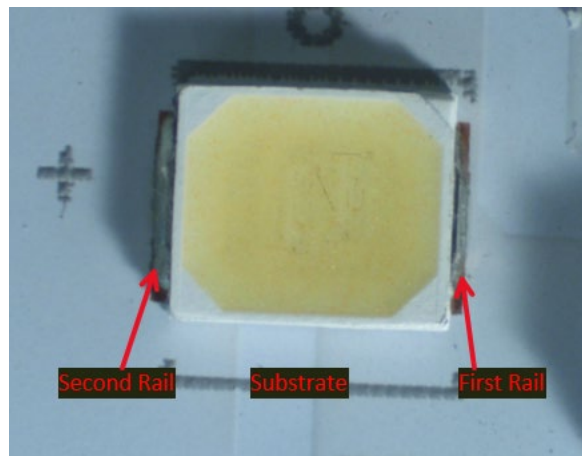
137. Defendant has infringed and is infringing, either literally or under the doctrine of equivalents, the '300 Patent in violation of 35 U.S.C. § 271 et seq., directly and/or indirectly, by

making, using, offering for sale, and/or selling in the United States, and/or importing into the United States without authority or license, products, including but not limited to the Current Lighting R20 LED Bulb among other substantially similar products (collectively, the “’300 Accused Products”).

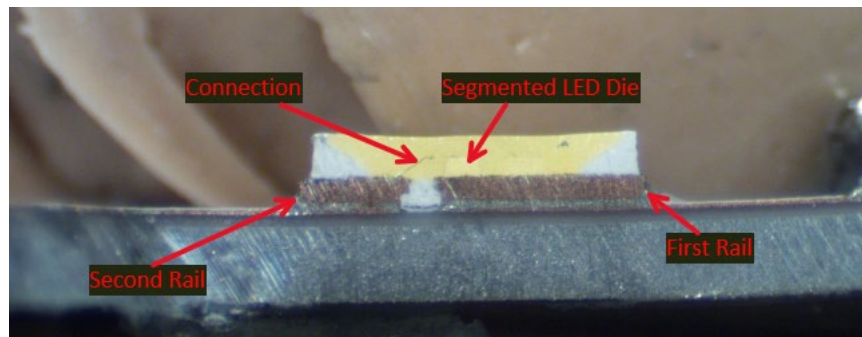
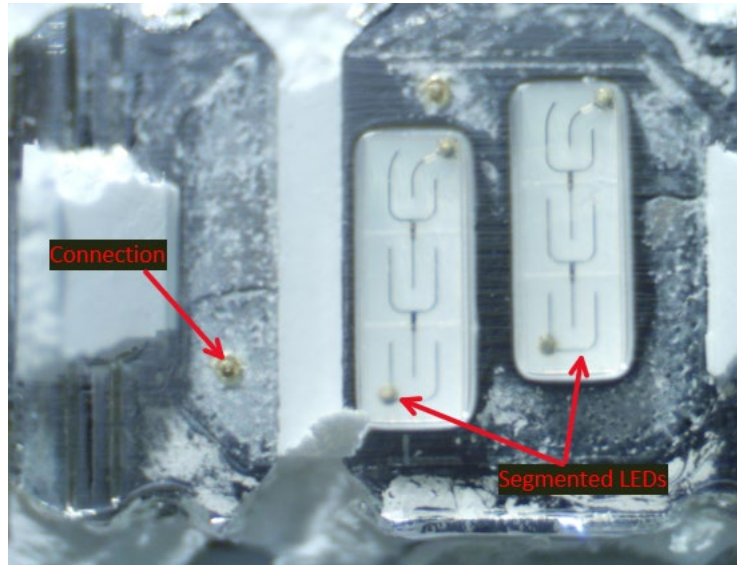
138. As just one non-limiting example, set forth below (with claim language in bold and italics) is exemplary evidence of infringement of claims 1 of the ’300 Patent. This description is based on publicly available information. Plaintiff reserves the right to modify this description, including, for example, on the basis of information about the ’300 Accused Products that it obtains during discovery.

139. ***1(a): A light source comprising:***—The Current Lighting R20 LED Bulb comprises a light source.

140. ***1(b): a substrate having first and second power rails; and***—The Current Lighting R20 LED Bulb comprises a substrate having first and second power rails, as seen in the annotated images below:



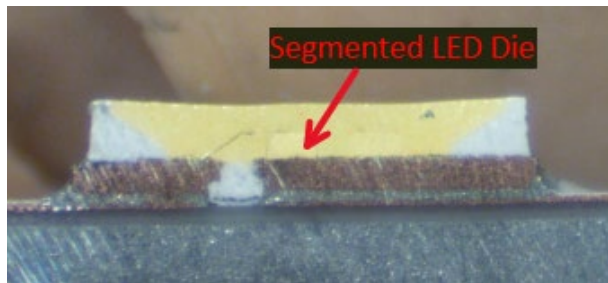
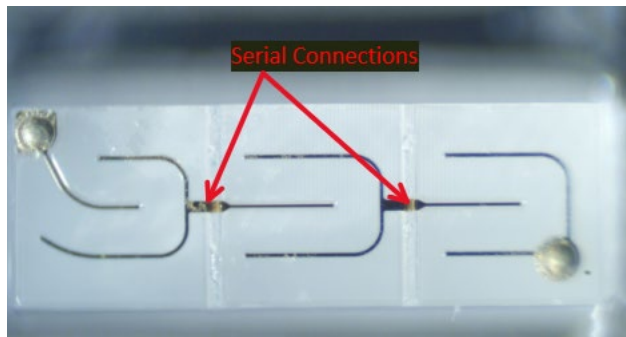
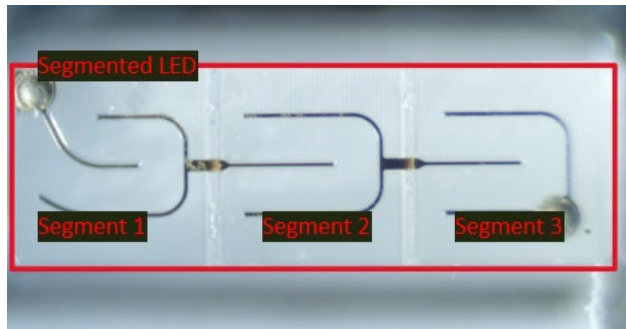
141. *1(c): a plurality of segmented LEDs connected between the first and second power rails*—The Current Lighting R20 LED Bulb comprises a plurality of segmented LEDs connected between the first and second power rails as seen in the annotated images below:



142. *1(d): wherein each segmented LED is configured to generate light when a power signal is applied to the first and second power rails*—In the Current Lighting R20 LED Bulb, each segmented LED is configured to generate light when a power signal is applied to the first and second power rails.

143. *1(e): wherein the plurality of segmented LEDs are provided by a single LED die that is divided into N segments serially connected to each other, with N being ≥ 1 , and*—The

plurality of segmented LEDs are provided by a single LED die that is divided into 3 segments serially connected to each other.



144. *1(f): wherein each segmented LED comprises a size that is 1/N times a size of a single junction LED fabricated in a same material as the segmented LED.—Each segmented LED is 1/3 the size of a single junction LED fabricated in the same material as the segmented LED.*

145. Additionally, Defendant has been and/or currently is an active inducer of infringement of the '300 Patent under 35 U.S.C. § 271(b) and a contributory infringer of the '300 Patent under 35 U.S.C. § 271(c).

146. Indeed, Defendant has been and/or currently is intentionally causing, urging, and/or encouraging customers to directly infringe one or more claims of the '300 Patent while being on notice of (or willfully blind to) the '300 Patent. For instance, Defendant has supplied and continues to supply the '300 Accused Products to customers (e.g., end users and/or distributors of the '300 Accused Products) while knowing that use of these products in their intended manner will directly infringe one or more claims of the '300 Patent.

147. Defendant has been and/or currently is knowingly and intentionally encouraging and aiding customers to engage in such direct infringement of the '300 Patent. As one example, Defendant promotes, advertises, and instructs customers or potential customers about the '300 Accused Products and uses of the '300 Accused Products. *See, e.g.,* <https://www.gecurrent.com/catalog/led-r20-lamps-38273>.

148. Defendant knows (and/or has known) that such encouraging and aiding does (and/or would) result in their customers directly infringing the '300 Patent. For instance, Defendant knows (and/or has known) of the existence of the '300 Patent or at least should have known of the existence of the '300 Patent but was willfully blind to its existence. Indeed, Defendant has had actual knowledge of the '300 Patent since at least as early as June 14, 2022, when Defendant received Plaintiff's Notice Letter. And, as a result of their knowledge of the '300 Patent (and/or as a direct and probable consequence of its willful blindness to this fact), Defendant specifically intends (and/or has intended) that its encouraging and aiding does (and/or would) result in direct infringement of the '300 Patent by Defendant's customers. On information and belief, Defendant

specifically intends (and/or has intended) that its actions will (and/or would) result in direct infringement of one or more claims of the '300 Patent and/or subjectively believes (and/or has believed) that its actions will (and/or would) result in infringement of the '300 Patent but has taken (and/or took) deliberate actions to avoid learning of those facts.

149. Additionally, Defendant has been and/or currently is contributorily infringing one or more claims of the '300 Patent by offering for sale, selling, and/or importing one or more components in connection with the '300 Accused Products that contribute to the direct infringement of the '300 Patent by customers of the '300 Accused Products. In particular, as set forth above, Defendant has had actual knowledge of the '300 Patent or are willfully blind to its existence since at least as early as June 14, 2022, when Defendant received Plaintiff's Notice Letter. Further, Defendant offers for sale, sells, and/or imports one or more components in connection with the '300 Accused Products that are not staple articles of commerce suitable for substantial noninfringing use, and Defendant knows (or should know) that such component(s) are especially made or especially adapted for use in infringement of the '300 Patent. Defendant has supplied (and/or continues to supply) the '300 Accused Products that comprise such component(s) to customers, who then directly infringe one or more claims of the '300 Patent by using the '300 Accused Products in their intended manner (e.g., pursuant to instructions provided by Defendant).

150. At least as early as the filing and/or service of this Complaint, Defendant's infringement of the '300 Patent was and continues to be willful and deliberate, thereby entitling Plaintiff to enhanced damages.

151. Additional allegations regarding Defendant's knowledge of the '300 Patent and willful infringement will likely have evidentiary support after a reasonable opportunity for discovery.

152. Defendant's infringement of the '300 Patent is exceptional and entitles Plaintiff to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

153. Plaintiff is in compliance with any applicable marking and/or notice provisions of 35 U.S.C. § 287 with respect to the '300 Patent.

154. Plaintiff is entitled to recover from Defendant all damages that Plaintiff has sustained as a result of Defendant's infringement of the '300 Patent, including, without limitation, a reasonable royalty.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests:

- A. That Judgment be entered that Defendant has infringed at least one or more claims of the Patents-in-Suit, directly and/or indirectly, literally and/or under the doctrine of equivalents;
- B. An award of damages sufficient to compensate Plaintiff for Defendant's infringement under 35 U.S.C. § 284, including an enhancement of damages on account of Defendant's willful infringement;
- C. That the case be found exceptional under 35 U.S.C. § 285 and that Plaintiff be awarded its reasonable attorneys' fees;
- D. Costs and expenses in this action;
- E. An award of prejudgment and post-judgment interest; and
- F. Such other and further relief as the Court may deem just and proper.

Respectfully submitted,

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