

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

FEIT ELECTRIC COMPANY, INC.,

Plaintiff,

v.

SAVANT TECHNOLOGIES LLC d/b/a GE
LIGHTING,

Defendant.

Case No. 1:24-cv-473

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Feit Electric Company, Inc. (“Plaintiff” or “Feit Electric”), for its Complaint against Defendant Savant Technologies LLC doing business as GE Lighting (“Defendant” or Savant”), hereby alleges as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement under the patent laws of the United States, 35 U.S.C. § 1 et seq. (“Patent Act”).

THE PARTIES

2. Feit Electric is a privately held company organized and existing under the laws of the State of California with its principal place of business at 4901 Gregg Road, Pico Rivera, CA 90660, Los Angeles County.

3. Feit Electric is engaged in the importation, distribution, and sale of lighting products that are manufactured for Feit Electric.

4. On information and belief, Savant is a Delaware Limited Liability Company organized and existing under the laws of the State of Delaware.

5. On information and belief, Savant has a principal place of business at 1975 Noble Road, Nela Park, Cleveland, Ohio, 44112 which is in the Northern District of Ohio.

JURISDICTION AND VENUE

6. Savant imports or causes to be imported, makes, offers to sell, sells, and/or uses products in the United States and in this jurisdiction, including, but not limited to, the products accused of infringement in this Complaint.

7. This Court has subject matter jurisdiction over Feit Electric's claims of patent infringement pursuant to at least 28 U.S.C. §§ 1331 and 1338.

8. This Court has personal jurisdiction over Savant because it has committed acts of patent infringement in this judicial district, has systematic and continuous contacts in this judicial district, regularly transacts business within this judicial district, regularly avails itself of the benefits of this judicial district, and has a principal place of business in this judicial district.

9. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400.

THE ASSERTED PATENT

10. On December 10, 2013, United States Patent No. 8,604,678 (Ex. A, "the '678 Patent") entitled "Wavelength Conversion Component With a Diffusing Layer" was duly and lawfully issued by the United States Patent and Trademark Office ("PTO"). A true and correct copy of the '678 patent is attached hereto as Exhibit A.

11. Feit Electric is the owner and assignee of all right, title, and interest in and to the '678 Patent.

12. On or about December 12, 2023, Feit Electric sent Savant a letter notifying it that importing, offering for sale, and selling lamps (also known as light bulbs) incorporating white LED filament packages will likely infringe at least one claim of a set of identified patents including but not limited to the '678 patent.

THE ACCUSED PRODUCTS

13. Savant has imported, offered for sale, sold, and/or used at least GE LED Pearl Filament Model No. LED6DBC/DL9GCQWF-3T (the "First Accused Product").

14. On or about March 6, 2024 Feit Electric caused to be purchased samples of the First Accused Product from Lowe's Home Centers, LLC at 509 River Way, Mooresville, NC 28117.

15. The packaging for the First Accused Product bears the following legend:

Manufactured for Savant Technologies LLC
Nela Park, Cleveland, Ohio 44112-1719

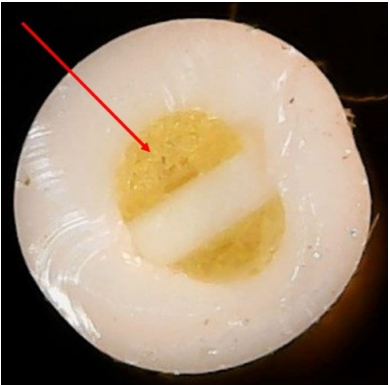
16. An image of the front and back of the packaging for the First Accused Product is set out below:





17. The Accused Product is a lamp (also known as a light bulb) comprising one or more light emitting diodes mounted on one or more substrates covered by at least a light conversion material mounted inside a lamp enclosure (bulb) and connected to receive power from the lamp base when inserted in a socket and energized to emit light. Such lamps are known as “LED filament lamps.”

INFRINGEMENT OF THE '678 PATENT

18. The First Accused Product infringes at least claim 1 of the '678 Patent, as described below:

Claim 1 of the '678 Patent	Claim Element Application	First Accused Product Images
[preamble] A wavelength conversion component for a light emitting device comprising:	The preamble does not serve as a limitation/element as it is not necessary to breathe life and meaning into the claim.	
a wavelength conversion layer comprising particles of at least one photoluminescence material;	The yellow material shown in the image at right and indicated by the red arrow comprises a wavelength conversion layer comprising particles of at least one photoluminescence material. On information and belief, the wavelength conversion layer comprises a phosphor that converts blue light to white light, mixed in a carrier material such as silicone.	

Claim 1 of the '678 Patent	Claim Element Application	First Accused Product Images
<p>and a light diffusing layer comprising particles of a light scattering material,</p>	<p>The white material shown in the image at right and indicated by the blue arrow comprises a light diffusing layer comprising particles of light scattering material. On information and belief, the light diffusing layer comprises a material such as titanium dioxide mixed in a carrier material such as silicone.</p>	
<p>wherein the light diffusing layer improves an off-state white appearance of the wavelength conversion component;</p>	<p>The off-state appearance of the LED filament is white rather than the yellow to orange appearance of the phosphor conversion material of typical LED filaments, as shown in the images of the bulb and filaments at right. Savant claims and admits that the “Pearl Filament HD bulbs provide a touch of sophistication. Compared to standard yellow LED filaments that disrupt a fixture’s aesthetic, the subtle filament and clear glass beautifully accentuate decorative fixtures. Together with high-definition energizing daylight, Pearl Filament HD bulbs elevate the charm of your lights when lit or unlit.” <i>See supra</i>, ¶ 16.</p>	

Claim 1 of the '678 Patent	Claim Element Application	First Accused Product Images
<p>wherein the wavelength conversion component is configured such that in operation a portion of excitation light comprising blue light having a wavelength of greater than or equal to 440 nm generated by the light emitting device is emitted through the wavelength conversion component to contribute to a final visible emission product.</p>	<p>On information and belief, when the LED filaments of the First Accused Product are powered, the LEDs of the LED filaments emit blue light greater than or equal to 440 nm, that is converted by the wavelength conversion layer to white light, and then the white light passes through and is scattered by the light diffusing layer to contribute to a final visible emission product as shown in the image at right.</p>	

19. Savant has infringed and continues to infringe one or more claims of the '678 Patent by offering for sale, selling, using, and/or importing the First Accused Product within or into the United States, either literally or under the doctrine of equivalents, in violation of 35 U.S.C. § 271.

20. The infringement by Savant has caused and is continuing to cause damage and irreparable injury to Feit Electric. Feit Electric will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court, as a remedy at law alone would be inadequate.

21. Feit Electric is entitled to injunctive relief and damages in accordance with 35 U.S.C. §§ 271, 281, 283, and 284.

WILLFUL INFRINGEMENT

22. On December 12, 2023, Feit Electric sent a letter (“the Notice Letter”) by FedEx addressed to:

Paul T. Martin
Senior Counsel
GE Lighting, a Savant Company
1975 Noble Road
East Cleveland, OH, 44112-1719

23. In its Notice Letter, Feit Electric stated that it “owns a set of patents directed to cover or mask the yellow/orange appearing phosphor and silicone coating on LED packages, including but not limited to filament LED packages and SMD LED packages,” specifically listing the ’678 patent as one of the patents owned by Feit Electric.

24. The Notice Letter also identified Savant’s “lamps incorporating white LED filament packages” and warned Savant of the high likelihood of patent infringement: “[i]t is highly likely that such white LED filament packages will infringe one or more of the noted patents.”

25. Having received the Notice Letter, Savant knew of the ’678 patent. Despite that knowledge, Savant has infringed and continues to infringe the ’678 patent.

26. On information and belief, in light of the Notice Letter’s warning of the high likelihood of patent infringement, Savant’s infringement is deliberate and/or intentional.

27. In light of the Notice Letter’s warning of the high likelihood of patent infringement, Savant’s infringement is egregious.

28. As such, Savant has willfully infringed and is continuing to willfully infringe one or more claims of the ’678 patent.

PRAYER FOR RELIEF

WHEREFORE, Feit Electric prays that the Court enter judgment and relief as follows:

- A. For a judgment that Savant has infringed the ’678 patent;
- B. For a preliminary and permanent injunction enjoining Savant and its officers, directors, servants, consultants, managers, employees, agents, attorneys, successors, assigns, affiliates, subsidiaries, and all persons in active concert or participation with any of them, from infringing the ’678 patent;

- C. For a judgment and award that Savant account for and pay to Feit Electric damages adequate to compensate for Savant's infringement of the '678 patent, including lost profits but in no event less than a reasonable royalty;
- D. For a judgment finding Savant's infringement willful and awarding treble damages under 35 U.S.C. § 284;
- E. For an order finding that this case is exceptional under 35 U.S.C. § 285 and awarding Feit Electric its costs, expenses, and disbursements incurred in this action, including reasonable attorneys' fees as available by law to be paid by Savant;
- F. For an award of pre-judgment interest, post-judgment interest, and costs in this action; and
- G. For an award of any and all other relief to Feit Electric as this Court deems necessary and proper under these circumstances.

Dated: March 13, 2024

Respectfully submitted,

BENESCH FRIEDLANDER COPLAN &
ARONOFF LLP

/s/ Michael S. Weinstein

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