

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

CURRENT LIGHTING SOLUTIONS, LLC

Plaintiff,

v.

SIGNIFY HOLDING B.V. AND  
SIGNIFY NORTH AMERICA CORPORATION

Defendants.

Civil Action No. 23-cv-11398

**JURY TRIAL DEMANDED**

**COMPLAINT**

Plaintiff Current Lighting Solutions, LLC (“Current”) files this complaint for declaratory judgment against defendants Signify Holding B.V. and Signify North America Corporation (collectively “Signify”), and states as follows:

**PARTIES**

1. Plaintiff Current is a Delaware limited liability company with its principal place of business located at 25825 Science Park Drive, Beachwood, OH 44122.
2. Upon information and belief, defendant Signify Holding B.V. (“Signify B.V.”) is a corporation organized and existing under the laws of The Netherlands with its registered office at High Tech Campus 28, 5656 AE Eindhoven, The Netherlands. Signify B.V. is a wholly owned subsidiary of Signify N.V., a corporation organized and existing under the laws of The Netherlands and the shares of which are publically held and traded.
3. Upon information and belief, defendant Signify North America Corporation (“Signify N.A.”) is a Delaware corporation with a principal place of business

at 200 Franklin Square Drive, Somerset, New Jersey 08873. Signify N.A. is a wholly owned, indirect, subsidiary of Signify B.V.

### **JURISDICTION AND VENUE**

4. This civil action seeks declaratory relief. As set forth more fully below, there is an actual and justiciable controversy between the parties concerning Current's alleged infringement of certain Signify patents, specifically US Patent Nos. 7,178,941 (the "'941 patent"); 7,262,559 (the "'559 patent"); 7,348,604 (the "'604 patent"); 7,542,257 (the "'257 patent"); 7,654,703 (the "'703 patent"); 7,670,038 (the "'038 patent"); 7,802,902 (the "'902 patent"); 7,866,845 (the "'845 patent"); 8,063,577 (the "'577 patent"); 8,246,200 (the "'200 patent"); 8,272,756 (the "'756 patent"); 8,629,631 (the "'631 patent"); 9,119,268 (the "'268 patent"); 9,159,521 (the "'521 patent"); (collectively the "Asserted Signify B.V. Patents") (attached as Exhibits 1-14, respectively) and 6,972,525 (the "'525 patent"); 7,256,554 (the "'554 patent"); 7,358,706 (the "'706 patent"); 7,737,643 (the "'643 patent") (collectively the "Asserted Signify N.A. Patents," and, together with the Asserted Signify B.V. Patents, the "Asserted Signify Patents") (attached as Exhibits 15-18, respectively).

5. The Court has subject matter jurisdiction with respect to these counts pursuant to 28 U.S.C. §§ 1331, 1338, 2201 and 2202.

#### *Signify B.V.*

6. Upon information and belief, Signify B.V. maintains a global patent licensing program it has branded and marketed as the "EnabLED" program. The EnabLED program purports to have over 1,400 licensees, hundreds of which are located within the United States. See <https://www.signify.com/global/our-company/intellectual-property/licensing#download>.

7. Upon information and belief, Signify B.V. is the current assignee of each of the Asserted Signify B.V. Patents.

8. Upon information and belief, Signify B.V. owns all right, title and interest, including the right to enforce each of the Asserted Signify B.V. Patents.

9. Upon information and belief, Signify B.V. has licensed the Asserted Signify B.V. Patents to hundreds of companies based within the United State through the EnabLED program. See <https://www.assets.signify.com/is/content/Signify/Assets/signify/global/20230322-annex-a-march-13-2023-website.pdf> (list of patents licensed under the EnabLED program), <https://www.signify.com/global/our-company/intellectual-property/licensing#download> (list of U.S. licensees).

10. Upon information and belief, the head of the EnabLED program in the United States is Mr. Daniel Gaudet. See <https://www.linkedin.com/in/daniel-gaudet-sa6a322/> (“Lead a team of a dozen US patent attorneys that are responsible for Signify's intellectual property in the Americas with direct management and oversight of Signify EnabLED patent license program . . .”). Mr. Gaudet led the development and launch of the EnabLED licensing program and has managed the EnabLED program from its inception. See *id.*

11. Upon information and belief, Mr. Gaudet maintains a regular place of business at 1 Van de Graff Drive, Suite 202, Burlington, MA 01803. See *id.*; see also <https://www.linkedin.com/in/aaron-rugh-a484a833> (profile of Mr. Aaron Rugh, Director of IP Licensing, one of Mr. Gaudet’s colleagues, also in Burlington).

12. Upon information and belief, Mr. Gaudet leads the team of attorneys responsible for Signify B.V.’s intellectual property rights within the United States. See

<https://www.linkedin.com/in/daniel-gaudet-sa6a322/> (“direct management and oversight of Signify EnabLED patent license program . . .”).

13. Upon information and belief, Mr. Gaudet and members of his team personally participate in licensing negotiations with regard to the EnabLED program on behalf of Signify B.V. *See id.*

14. Upon information and belief, Mr. Gaudet and members of his team represent, expressly or implicitly, to potential licensees under the EnabLED program that they have authorization to negotiate on behalf of Signify B.V.

15. Upon information and belief, Mr. Gaudet and members of his team do, in fact, act as Signify B.V.’s agents with respect to the Asserted Signify B.V. Patents with respect to licensing, enforcement and litigation.

16. Upon information and belief, Mr. Gaudet’s duties include overseeing enforcement efforts, including litigation, in the United States concerning one or more of the Asserted Signify B.V. Patents. *See id.*

17. Mr. Gaudet and other lawyers from the Burlington office have, on several occasions, met with Current’s representatives and alleged that certain of Current’s products allegedly infringe one or more patents licensed within the EnabLED program, including all of the Asserted Signify B.V. Patents.

18. Upon information and belief, Mr. Gaudet conducted most of these discussions between Signify B.V. and Current from his office in Burlington, MA.

19. In light of the foregoing, Signify B.V. maintains or has maintained continuous and systematic contacts with Massachusetts, maintains an office within Massachusetts, regularly does or solicits business within Massachusetts, derives

significant revenue from its licensing activities within Massachusetts, and conducted at least some of its discussions with Current concerning the Asserted Signify B.V. Patents from Massachusetts.

20. In light of the foregoing, Signify B.V. is subject to both general and specific jurisdiction in this judicial district pursuant to due process and/or the Massachusetts Long-Arm Statute.

21. In the alternative, the Court has personal jurisdiction over Signify B.V. pursuant to Fed. R. Civ. P. 4(k)(2). Current's claims arise under federal law. Further, upon information and belief, other than through its operations in Massachusetts, Signify B.V. would not be subject to the jurisdiction of the courts of general jurisdiction of any state. Signify B.V.'s activities in the United States are nonetheless extensive. Upon information and belief, Signify B.V. has licensed the Asserted Signify B.V. Patents to hundreds of lighting companies located within the United States, enforced many of the Asserted Signify B.V. Patents against lighting companies via the United States judicial system, and purposefully availed itself of the protections and privileges under United States patent law by dint of seeking, owning and enforcing United States patents. Upon information and belief, Signify B.V. has also derived substantial revenue from its efforts licensing and enforcing *inter alia*, the Asserted Signify B.V. Patents. The exercise of jurisdiction over Signify B.V. is therefore reasonable and comports with Due Process given that Signify B.V. does business within the United States, has purposefully availed itself of the privilege and protections of United States law, and because the individual who oversees and directs Signify B.V.'s patent licensing, enforcement and litigation activities within the United States, Mr. Gaudet, maintains an office in the United States.

In light of the foregoing, the Court has personal jurisdiction over Signify B.V. pursuant to Fed. R. Civ. P. 4(k)(2).

22. Venue is proper in this judicial district as to Signify B.V. pursuant to 28 U.S.C. § 1391 because, *inter alia*, Signify B.V. is not a resident of the United States and may be sued in any judicial district, including this one, is subject to personal jurisdiction within this judicial district, and has a regular and established place of business in Massachusetts.

*Signify N.A.*

23. Upon information and belief, Signify N.A. is a wholly owned subsidiary of Genlyte Group Inc., a corporation organized under the laws of Delaware and having its principal place of business at 200 Franklin Square Drive, Somerset, New Jersey 08873.

24. Upon information and belief, Genlyte Group Inc. is wholly owned by defendant Signify B.V.

25. Upon information and belief, Signify N.A. is the current assignee of each of the Asserted Signify N.A. Patents.

26. Upon information and belief, Signify N.A. owns all right, title and interest, including the right to enforce, each of the Asserted Signify N.A. patents.

27. The Asserted Signify N.A. patents have been licensed to hundreds of companies within the United States through the EnabLED program. *See* <https://www.assets.signify.com/is/content/Signify/Assets/signify/global/20230322-annex-a-march-13-2023-website.pdf> (list of patents licensed under the EnabLED program), <https://www.signify.com/global/our-company/intellectual-property/licensing#download> (list of U.S. licensees).

28. Upon information and belief, Signify N.A. maintains an office at 1 Van de Graff Drive, Suite 202 Burlington, MA 01803, USA.

29. The office at 1 Van de Graff Drive, Suite 202, Burlington, MA 01803 is described as a “Signify” office and also the headquarters of Color Kinetics, a brand under which Signify N.A. sells and offers for sale various LED lighting products. *See* <https://www.colorkinetics.com/global/showcase/burlington-office>. The office at 1 Van de Graff Drive, Suite 202, Burlington, MA 01803 is further described as the leading global research and development center for Signify’s entire LED luminaires business. *See* <https://www.colorkinetics.com/global/showcase/ckhq>.

30. Upon information and belief, Mr. Gaudet leads the team of attorneys responsible for Signify N.A.’s intellectual property rights within the United States, including the Asserted Signify N.A. Patents. *See* <https://www.linkedin.com/in/daniel-gaudet-sa6a322/>.

31. Upon information and belief, Mr. Gaudet and members of his team personally participate in licensing negotiations with regard to the EnabLED program on behalf of Signify N.A., including with regard to the Asserted Signify N.A. Patents. *See id.*

32. Upon information and belief, Mr. Gaudet and members of his team represent, expressly or implicitly, to potential licensees under the EnabLED program that they have authorization to negotiate on behalf of Signify N.A., including with regard to the Asserted Signify N.A. Patents.

33. Upon information and belief, Mr. Gaudet and members of his team do, in fact, act as Signify N.A.'s agents with respect to licensing, enforcement and litigation regarding the Asserted Signify N.A. Patents.

34. Upon information and belief, Mr. Gaudet's duties include overseeing enforcement efforts, including litigation, in the United States concerning the Asserted Signify N.A. Patents.

35. Mr. Gaudet and other lawyers from the Burlington office have, on several occasions met with Current's representatives and alleged that certain of Current's products allegedly infringe the Asserted Signify N.A. Patents.

36. Upon information and belief, Mr. Gaudet conducted the discussions between Signify N.A. and Current with regard to the Asserted Signify N.A. Patents from his office in Burlington, MA.

37. Upon information and belief, Signify N.A. offers LED lighting products for sale throughout the United States under a variety of brands, including but not limited to Philips, Interact, Color Kinetics etc. See <https://www.signify.com/en-us/brands> (listing Signify brands).

38. Upon information and belief, Signify N.A. offers LED lighting products for sale throughout the United States, including within Massachusetts, that Signify contends embody one or more of the inventions claimed in the Asserted Signify N.A. Patents as well as the Asserted Signify B.V. Patents. See, e.g. <https://www.usa.lighting.philips.com/support/purchase/where-to-buy>.

39. Upon information and belief, Signify N.A. acts as agent for Signify B.V. with regard to sales of Signify-branded LED lighting products within the United States.

40. In light of the foregoing, Signify N.A. maintains or has maintained continuous and systematic contacts with Massachusetts, maintains an office within Massachusetts, regularly does or solicits business within Massachusetts and conducted its discussions with Current concerning the Asserted Signify N.A. Patents from Massachusetts.

41. In light of the foregoing, Signify N.A. is subject to both general and specific jurisdiction in this judicial district pursuant to due process and/or the Massachusetts Long-Arm Statute.

42. In light of the foregoing, venue is proper in this judicial district as to Signify N.A. pursuant to 28 U.S.C. § 1391 because, *inter alia*, Signify N.A. has a regular and established place of business in Massachusetts, including at least at 1 Van de Graff Drive, Suite 202, Burlington, MA 01803 and is subject to personal jurisdiction within Massachusetts.

### **FACTUAL BACKGROUND**

#### *Current's History of Innovation*

43. Current is a former subsidiary of General Electric Co. ("GE"), a company at the forefront of innovation in the lighting and illumination field for over 125 years. GE was formed by the combination of, *inter alia*, various companies of Thomas Edison, the inventor of the incandescent light bulb. Building upon Edison's first carbon filament light bulb, GE pioneered the machine-blown light bulb (1892), the ductile tungsten filament used in modern incandescent bulbs (1909), the fluorescent lamp (1938), the halogen lamp (1959) and the first LED to emit visible light (1962).

44. GE bulbs and fixtures have lit numerous historic settings and events, including the first commercial lighting on a steamship (1890), the first large-scale

application of electronic lighting controls, installed for the Chicago Civic Opera (1929), the first night game in major league baseball (1935) and the first lighting of Niagara Falls (1979). The shape of an incandescent light bulb – which still resembles Edison’s original design – has become an international symbol for innovation and bright ideas.

45. As a result of its own legacy of innovation, Current respects and values legitimate intellectual property. Indeed, Current holds hundreds of its own patents, including scores relating specifically to LED lighting technology, ranging from LED phosphors, to drivers, to optics, and virtually every other facet of an LED light fixture or bulb.

*Signify’s Accusations*

46. Upon information and belief, over the last 14 years Signify has approached hundreds of lighting companies, accused them of infringing one or more of Signify’s patents, and demanded that they enter a broad, portfolio-wide license and pay royalties to Signify. Signify has sued several companies that failed to comply.

47. Over that same timespan, however, many of the patents Signify previously highlighted in its licensing negotiations have expired.

48. Over that same timespan, many of the patents Signify previously highlighted in its licensing negotiations have been narrowed and/or weakened through unfavorable claim constructions or, in other cases, by having key claims invalidated.

49. The remaining patents within Signify’s patent portfolio are generally directed to small, incremental, and ancillary technologies that are not widely adopted within the industry. Many of them are also invalid.

50. Signify has accused certain Current LED drivers and fixtures of infringing the Asserted Signify Patents.

51. Current has analyzed Signify's accusations and determined they are without merit.

52. Current has sought to engage Signify on the merits of its position(s). Signify recently cut off all merits discussions.

53. There are fundamental disagreements between the parties as to the scope, infringement, validity, and value of the Asserted Signify Patents.

54. Signify continues to contend that one or more Current fixtures and drivers infringe at least one claim of each of the Asserted Signify Patents. Current disagrees.

55. Signify has repeatedly sued lighting companies unwilling to pay its licensing demands.

56. Absent the declaratory relief it now seeks, Current expects Signify to continue accusing Current fixtures and drivers of infringing the Asserted Signify Patents and threatening Current with litigation.

57. Current therefore brings the present action to affirmatively engage and resolve Signify's baseless contentions.

**Count I**  
**(Declaration of Non-Infringement of the '941 Patent)**

58. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

59. Signify contends that various fixtures infringe certain claims of the '941 patent, *e.g.* claim 10, including, but not limited to, Current's Albeo product line (*e.g.* Albeo High Bay Model ABV101V571NVSTKNW1PK, Albeo LED Luminaire, Linear, ALV2 Series Model ALV204T04T481DSQVQSTLQW1PK, Albeo LED Luminaire

(Modular High & Low Bay) Model ABC1012571DQVSTKQW1PK, Albeo LED Luminaire (ABV3-Series) Model ABV3018T571DQVSTKQW1PK, Albeo LED Luminaire, Linear, ALV2 Series Model ALV204T03T481DSQVQSTKQW), Current's Lumination product line (*e.g.* Lumination LIS Series, Model LISI4B042D1P35VQCSWHITE) and Current's Arize product line (*e.g.* Arize Horticulture Batten LED Luminaire Model GEHL48HPPR1 & GEHL48HPPB1), and all substantially similar products (collectively, the "Accused '941 Fixtures").

60. Claim 10 of the '941 patent requires "a first channel extending longitudinally within the housing."

61. None of the Accused '941 Fixtures contain a "first channel extending longitudinally within the housing," as claimed in claim 10 of the '941 patent.

62. In light of at least the foregoing, the Accused '941 Fixtures do not infringe any claims of the '941 patent.

## **Count II** **(Declaration of Non-Infringement of the '559 Patent)**

63. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

64. Signify contends that various Current LED drivers infringe certain claims of the '559 patent, *e.g.* claims 6, 10 and 11, including, but not limited to, Current's GED150MC, GELD100MV480PVNA, GEO75/1050/MV-GL, GELD50MV700PVNA, GELD100MV480PVNA, GELD100MV480PVNA2, GED100MC/VD1P700S, GED100MVP1480L, GED90MC/V2P1750S2, GED50MV1P600, GED90MCV2P1750P, GED150MC/VD1P700S, GED22MCV2P500P, and GELD18DMV700PU drivers as well

as the drivers within certain fixtures including, but not limited to, Current's Evolve product line (*e.g.* Evolve LED Canopy Area Light Model ECBB0B5F5401AWHITE, Evolve LED Series (EAL) Area Light Model EALS020F4AF740NDD1DKBZH, Evolve LED Area Light (EAN) Model EANB0C37501CDKBZ, Evolve LED Flood Light (EFN) Model FNB0A37401KCKBZ, Evolve EWAS Wallpack Series Model EWAS010C4AF750N1FMDKBZ, Evolve LED L-Series Wall Pack, EWLS Model EWLS02040AF740N1FMDKBZ, Evolve LED Roadway Light Model ERL1009B340AGRAY, Evolve LED Series (EAL) Area Light Model EAL030H4AF740NDD1DKBZ), Current's Albeo product line (*e.g.* Albeo High Bay Model ABV101V571INVSTKNW1PK, Albeo LED Luminaire (ALV1 Series) Model ALV101V4714SNVSTKNW, Albeo LED Luminaire (Modular High & Low Bay) Model ABC1012571DQVSTKQW1PK, Albeo LED Luminaire (ABV3-Series) Model ABV3018T571DQVSTKQW1PK, Albeo LED Luminaire, Linear, ALV2 Series Model ALV204T03T481DSQVQSTKQW), and Current's Lumination product line (*e.g.* Lumination LED Luminaire - Backlit Recessed Troffer Series Model BR220A2AVWHITE UL 35K, Lumination LED Luminaire 4ft Wide Model WS-4W-0-A3-S-V-WHITE, Lumination LED Recessed Luminaire Model LVT24B048MM835VOLTWHITE, Lumination LED Recessed Luminaire Model LVT24B040MM840VOLTWHITE, LRX Series Model LRXR610840MD), and all substantially similar products (collectively, the "Accused '559 Drivers").

65. Claims 10 and 11 of the '559 patent require a "differential amplifier."

66. None of the Accused '559 Drivers contains a "differential amplifier," as claimed in claims 10 or 11 of the '559 patent.

67. Claims 10 and 11 of the '559 patent also require “means for adjusting a gain of said differential amplifier.”

68. The International Trade Commission (“ITC”), in construing the terms of the '559 patent, has held that the term, “means for adjusting a gain of said differential amplifier,” is a means-plus-function limitation per 35 U.S.C. § 112, ¶6 (pre-AIA).

69. The ITC has also held that the corresponding structure for the “means for adjusting a gain of said differential amplifier” is resistors R24, R25, R26, and R27 shown in Figure 5 of the '559 patent and equivalents thereof.

70. None of the Accused '559 Drivers have a set of four resistors, arranged as in Figure 5, that meet the “means for adjusting a gain of said differential amplifier” limitation of claims 10 and 11 of the '559 patent.

71. Claim 6 of the '559 patent requires “a detection circuit operable to provide a detection signal” with “a first level representative of a load condition of the LED light source.”

72. None of the Accused '559 Drivers has a detection signal with “a first level representative of a load condition of the LED light source,” as claimed in claim 6 of the '559 patent.

73. Claim 6 of the '559 patent requires “a detection circuit operable to provide a detection signal” with “a second level representative of either a short condition or an open condition.”

74. None of the Accused '559 Drivers has a detection signal with “a second level representative of either a short condition or an open condition,” as claimed in claim 6 of the '559 patent.

75. In light of at least the foregoing, the Accused '559 Drivers do not infringe any claims of the '559 patent.

**Count III**  
**(Declaration of Non-Infringement of the '604 Patent)**

76. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

77. Signify contends that various fixtures infringe certain claims of the '604 patent, *e.g.* claim 1, including, but not limited to, Current's Evolve product line (*e.g.* Evolve Security Light Model 48TM69, Evolve LED Canopy Area Light Model ECBB0B5F5401AWHITE, Evolve LED Wall Pack Model EWS30C7D1401DKBZ, Evolve LED Series (EAL) Area Light Model EALS020F4AF740NDD1DKBZH, Evolve LED Series (ERS1) Roadway Scalable Model ERS10BXCX5572GRAY, Evolve LED Area Light (EAN) Model EANB0C37501CDKBZ, Evolve LED Flood Light (EFN) Model EFNB0A37401KCKBZ) and Current's Albeo product line (*e.g.* Albeo High Bay Model ABV101V571INVSTKNW1PK, Albeo LED Luminaire (ALV1 Series) Model ALV101V4714SNVSTKNW), and all substantially similar products (collectively, the "Accused '604 Fixtures").

78. Claim 1 of the '604 patent requires "fastening means for detachably coupling the housing element to the heat dissipation element."

79. None of the Accused '604 Fixtures contain "fastening means," as claimed in claim 1 of the '604 patent.

80. In light of at least the foregoing, the Accused '604 Fixtures do not infringe any claims of the '604 patent.

**Count IV**  
**(Declaration of Non-Infringement of the '257 Patent)**

81. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

82. Signify contends that various Current LED drivers infringe certain claims of the '257 patent, *e.g.* claim 1, including, but not limited to, Current's GED150MC, GELD100MV480PVNA, GEO75/1050/MV-GL, GELD50MV700PVNA, GED150MC/VD1p700S, D050MP25X47V1SM drivers as well as the drivers within certain fixtures including, but not limited to Current's Evolve product line (*e.g.* Evolve Security Light Model 48TM69, Evolve LED Canopy Area Light Model ECBB0B5F5401AWHTE, Evolve LED Wall Pack Model EWS30C7D1401DKBZ, Evolve LED Series (EAL) Area Light Model EALS020F4AF740NDD1DKBZH, Evolve LED Flood Light (EFN) Model EFN0A37401KCKBZ, Evolve LED Series Garage Light Model EG2R0A5PS5011WHTE, Evolve LED Area Lighting, Canopy Light, (ECLS) Model ECLS010A5SM75011SMWHTE), Current's Albeo product line (*e.g.* Albeo High Bay Model ABV101V571NVSTKNW1PK), and Current's Lumination product line (*e.g.* Lumination LED Luminaire - Backlit Recessed Troffer Series Model BR220A2AVWHTE UL 35K, LRX Series Model LRXR610840MD), and all substantially similar products (collectively, the "Accused '257 Drivers").

83. Claim 1 of the '257 patent requires a "switching power supply configured to provide power factor correction and an output voltage to a load via control of a single switch."

84. None of the Accused '257 Drivers has a switching power supply that provides power factor correction and an output voltage to a load via a control of a single switch, as claimed in claim 1 of the '257 patent.

85. In light of at least the foregoing, the Accused '257 Drivers do not infringe any claims of the '257 patent.

**Count V**  
**(Declaration of Non-Infringement of the '703 Patent)**

86. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

87. Signify contends that various fixtures infringe certain claims of the '703 patent, *e.g.* claim 17, including, but not limited to, Current's Evolve product line (*e.g.* Evolve LED Series (EAL) Area Light Model EALS020F4AF740NDD1DKBZH, Evolve LED Series (ERS1) Roadway Scalable Model ERS10BXCX5572GRAY, Evolve EWAS Wallpack Series Model EWAS010C4AF750N1FMDKBZ, Evolve LED L-Series Wall Pack, EWLS Model EWLS02040AF740N1FMDKBZ, Evolve LED Series Garage Light Model EG2R0A5PS5011WHITE, Evolve LED Series (EAL) Area Light Model EAL030H4AF740NDD1DKBZ, Evolve LED Flood Light, 15000 lm, 96W Model EFM1010CC76740NAK1DKBZ, Evolve LED Series EACL Area Light (73W) Model EACL010D4AF750NDD1DKBZ), Current's Albeo product line (*e.g.* Albeo High Bay Model ABV101V571INVSTKNW1PK, Albeo LED Luminaire, Linear, ALV2 Series Model ALV204T04T481DSQVQSTLQW1PK, Albeo LED Luminaire (ABV3-Series) Model ABV3018T571DQVSTKQW1PK, Albeo LED Luminaire, Linear, ALV2 Series Model ALV204T03T481DSQVQSTKQW), and Current's Lumination product line (*e.g.*

Lumination LED Recessed Luminaire Model LVT22BO33MM840VOLTWHITE, Lumination LIS Series Model LISI4B042D1P35VQCSWHITE, Lumination LED Recessed Luminaire Model LVT24B048MM835VOLTWHITE), and all substantially similar products (collectively, the “Accused ’703 Fixtures”).

88. Claim 17 of the ’703 patent requires that “at least one of the controller and the power supply is thermally isolated within the second internal compartment.”

89. None of the Accused ’703 Fixtures has a controller or a power supply thermally isolated within a second internal compartment, as claimed in claim 17 of the ’703 patent.

90. In light of at least the foregoing, the Accused ’703 Fixtures do not infringe any claims of the ’703 patent.

**Count VI**  
**(Declaration of Non-Infringement of the ’038 Patent)**

91. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

92. Signify contends that various fixtures infringe certain claims of the ’038 patent, *e.g.* claim 1, including, but not limited to, Current’s Evolve product line (*e.g.* Evolve Security Light Model 48TM69, Evolve LED Wall Pack Model EWS30C7D1401DKBZ, Evolve LED Series (EAL) Area Light Model EALS020F4AF740NDD1DKBZH, Evolve LED Series (ERS1) Roadway Scalable Model ERS10BXCX5572GRAY, Evolve LED Area Light (EAN) Model EANB0C37501CDKBZ, Evolve LED Flood Light (EFN) Model EFN0A37401KCKBZ, Evolve EWAS Wallpack Series, Model

EWAS010C4AF750N1FMDKBZ, Evolve LED L-Series Wall Pack, EWLS Model EWLS02040AF740N1FMDKBZ, Evolve LED Series Garage Light Model EG2R0A5PS5011WHITE, Evolve LED Roadway Light Model ERL1009B340AGRAY, Evolve LED Series (EAL) Area Light Model EAL030H4AF740NDD1DKBZ, Evolve LED Series EACL Area Light (73W) Model EACL010D4AF750NDD1DKBZ) and Current's Lumination product line (*e.g.* Lumination LED Luminaire 4ft Wide Model WS-4W-0-A3-S-V-WHITE), and all substantially similar products (collectively, the "Accused '038 Fixtures").

93. Claim 1 of the '038 patent requires that "the light intensity distribution in the emission plane decreases as a distance from the first face increases."

94. None of the Accused '038 Fixtures emit light such that the "the light intensity distribution in the emission plane decreases as a distance from the first face increases," as claimed in claim 1 of the '038 patent.

95. In light of at least the foregoing, the Accused '038 Fixtures do not infringe any claims of the '038 patent.

**Count VII**  
**(Declaration of Non-Infringement of the '902 Patent)**

96. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

97. Signify contends that various fixtures infringe certain claims of the '902 patent, *e.g.* claim 12, including, but not limited to, Current's Evolve product line (*e.g.* Evolve LED Wall Pack Model EWS30C7D1401DKBZ, Evolve LED Canopy Area Light ECBB0B5F5401AWHITE) and Currents Lumination product line (*e.g.* Lumination LED

Luminaire 4ft Wide Model WS-4W-0-A3-S-V-WHITE) and Current's Albeo product line (*e.g.* ALV1 Series Model ALV101V4714SNVSTKNW) and all substantially similar products (collectively, the "Accused '902 Fixtures").

98. Claim 12 of the '902 Patent requires a "thermal management system [that] includes a first printed circuit board having the at least one LED mounted thereon and a second printed circuit board having at least a portion of the LED driver mounted thereon."

99. None of the Accused '902 Fixtures have a "thermal management system [that] includes a first printed circuit board having the at least one LED mounted thereon and a second printed circuit board having at least a portion of the LED driver mounted thereon," as claimed in claim 12 of the '902 patent.

100. In light of at least the foregoing, the Accused '902 Fixtures do not infringe any claims of the '902 patent.

**Count VIII**  
**(Declaration of Non-Infringement of the '845 Patent)**

101. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

102. Signify contends that various fixtures infringe certain claims of the '845 patent, *e.g.* claim 5, including, but not limited to, Current's Evolve product line (*e.g.* Evolve LED Wall Pack Model EWS30C7D1401DKBZ, Evolve LED Series Roadway Scalable Model ERS10BXCX5572GRAY, Evolve LED Area Light (EAN) EANB0C37501CDKBZ, and all substantially similar products (collectively, the "Accused '845 Fixtures").

103. Claim 1 of the '845 patent requires a “reflector body including a first pair of walls positioned substantially orthogonal to a second pair of walls.”

104. None of the Accused '845 Fixtures have a “reflector body including a first pair of walls positioned substantially orthogonal to a second pair of walls,” as claimed in claim 1 of the '845 patent.

105. In light of at least the foregoing, the Accused '845 Fixtures do not infringe any claims of the '845 patent.

**Count IX**  
**(Declaration of Non-Infringement of the '577 Patent)**

106. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

107. Signify contends that various Current LED drivers infringe certain claims of the '577 patent, *e.g.* claim 1, including, but not limited to, Current's GED150MC, GELD100MV480PVNA, GEO75/1050/MV-GL, GELD50MV700PVNA, GED100MC/VD1P700S, GED100MVP1480L, GED90MC/V2P1750S2, GED50MV1P600, GED90MCV2P1750P, GED150MC/VD1P700S, GED22MCV2P500P drivers as well as the drivers within certain fixtures including but not limited to, Current's Evolve product line (*e.g.* Evolve LED Canopy Area Light Model ECBB0B5F5401AWHTE, Evolve LED Series (EAL) Area Light Model EALS020F4AF740NDD1DKBZH, Evolve LED Area Light (EAN) Model EANB0C37501CDKBZ, Evolve LED Flood Light (EFN) Model EFNB0A37401KCKBZ, Evolve EWAS Wallpack Series Model EWAS010C4AF750N1FMDKBZ, Evolve LED L-Series Wall Pack, EWLS Model

EWLS02040AF740N1FMDKBZ, Evolve LED Roadway Light Model  
ERL1009B340AGRAY, Evolve LED Series (EAL) Area Light Model  
EAL030H4AF740NDD1DKBZ), Current's Albeo product line (*e.g.* Albeo High Bay  
Model ABV101V571NVSTKNW1PK, Albeo LED Luminaire (ABV3-Series) Model  
ABV3018T571DQVSTKQW1PK, Albeo LED Luminaire, Linear, ALV2 Series Model  
ALV204T03T481DSQVQSTKQW), and Current's Lumination product line (*e.g.*  
Lumination LED Luminaire - Backlit Recessed Troffer Series Model  
BR220A2AVWHITE UL 35K, Lumination LED Luminaire 4ft Wide Model WS-4W-0-  
A3-S-V-WHITE, Lumination LED Recessed Luminaire Model  
LVT24B048MM835VOLTWHITE, Lumination LED Recessed Luminaire Model  
LVT24B040MM840VOLTWHITE), and all substantially similar products (collectively,  
the "Accused '577 Drivers").

108. Claim 1 of the '577 patent requires "an inductor connected in series with the set of output terminals, and the value of the inductor is selected to provide a substantially constant current through the LED."

109. None of the Accused '577 Drivers has an inductor in series with a set of output terminals selected to provide a substantially constant current through the LED, as claimed in claim 1 of the '577 patent.

110. In light of at least the foregoing, the Accused '577 Drivers do not infringe any claims of the '577 patent.

**Count X**  
**(Declaration of Non-Infringement of the '200 Patent)**

111. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

112. Signify contends that various fixtures infringe certain claims of the '200 patent, *e.g.* claim 5, including, but not limited to, Current's Evolve product line (*e.g.* Evolve LED Wall Pack Model EWS30C7D1401DKBZ, Evolve LED Series Garage Light Model EG2R0A5PS5011WHITE, Evolve LED Series Roadway Scalable Model ERS10BXCX5572GRAY, Evolve LED Roadway Light Model ERL1009B340AGRAY, Evolve LED Flood Light, 15000 lm, 96W Model EFM1010CC76740NAK1DKBZ, and all substantially similar products (collectively, the "Accused '200 Fixtures").

113. Claim 1 of the '200 patent requires an "optical module array comprising a plurality of optical modules, each comprising a first optical component covering a corresponding light emitting element and a second optical component covering another corresponding light emitting element."

114. None of the Accused '200 Fixtures have a "plurality of optical modules, each comprising a first optical component covering a corresponding light emitting element and a second optical component covering another corresponding light emitting element," as claimed in claim 1 of the '200 patent.

115. In light of at least the foregoing, the Accused '200 Fixtures do not infringe any claims of the '200 patent.

**Count XI**  
**(Declaration of Non-Infringement of the '756 Patent)**

116. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

117. Signify contends that various fixtures infringe certain claims of the '756 patent, *e.g.* claim 1, including, but not limited to, Current's Evolve product line (*e.g.* GE Evolve LED Area Light EACL) and Current's Albeo product line (*e.g.* Albeo High Bay Model ABV101V571NVSTKNW1PK), and all substantially similar products (collectively, the "Accused '756 Fixtures").

118. Claim 1 of the '756 patent requires "a plurality of protrusions running alongside a back side of the flat surface, the first contoured surface, or the second contoured surface of the channel."

119. None of the Accused '756 Fixtures have "a plurality of protrusions running alongside a back side of the flat surface, the first contoured surface, or the second contoured surface of the channel," as claimed in claim 1 of the '756 patent.

120. In light of at least the foregoing, the Accused '756 Fixtures do not infringe any claims of the '756 patent.

**Count XII**  
**(Declaration of Non-Infringement of the '631 Patent)**

121. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

122. Signify contends various Current LED drivers infringe certain claims of the '631 patent, *e.g.* claim 1, including, but not limited to, Current's GELD100MV, 100MVP1480L, GED50MV1P600, GELD100MV480PVNA2, D050MP25X47V1SM drivers as well as the drivers within certain fixtures including, but not limited to, Current's Evolve product line (*e.g.* Evolve Security Light Model 48TM69, Evolve LED Wall Pack Model EWS30C7D1401DKBZ, Evolve EWAS Wallpack Series Model

EWAS010C4AF750N1FMDKBZ, Evolve LED L-Series Wall Pack, EWLS Model  
EWLS02040AF740N1FMDKBZ, Evolve LED Series Garage Light Model  
EG2R0A5PS5011WHITE, Evolve LED Roadway Light Model ERL1009B340AGRAY,  
Evolve LED Area Lighting, Canopy Light, (ECLS) Model  
ECLS010A5SM75011SMWHITE), and Current's Albeo product line (*e.g.* Albeo LED  
Luminaire (Modular High & Low Bay) Model ABC1012571DQVSTKQW1PK, Albeo  
LED Luminaire (ABV3-Series) Model ABV3018T571DQVSTKQW1PK), and all  
substantially similar products (collectively, the "Accused '631 Drivers").

123. Claim 1 of the '631 patent requires a "start-up constant current source coupled between the DC power source and the Vcc power supply capacitor, wherein the start-up constant current source provides a constant current charge to the Vcc power supply capacitor until a threshold voltage is reached thereon."

124. None of the Accused '631 Drivers has a start-up constant current source coupled between the DC power source and the Vcc power supply capacitor, wherein the start-up constant current source provides a constant current charge to the Vcc power supply capacitor until a threshold voltage is reached thereon, as claimed in claim 1 of the '631 patent.

125. In light of at least the foregoing, the Accused '631 Drivers do not infringe any claims of the '631 patent.

**Count XIII**  
**(Declaration of Non-Infringement of the '268 Patent)**

126. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

127. Signify contends that various Current LED drivers infringe certain claims of the '268 patent, *e.g.* claim 1, including, but not limited to, Current's GED150MC, GELD100MV480PVNA, GELD50MV700PVNA, GED150MC/VD1p700S, GED100MC/VD1P700S, 100MVP1480L, GED90MC/V2P1750S2, GELD100MV480PVNA2, D050MP25X47V1SM, GED150MC/VD1P700S drivers as well as the drivers within certain fixtures including, but not limited to, Current's Evolve product line (*e.g.* LED Evolve Security Light Model 48TM69, Evolve LED Wall Pack Model EWS30C7D1401DKBZ, Evolve LED Series (EAL) Area Light Model ALS020F4AF740NDD1DKBZH, Evolve LED Area Light (EAN) Model EANB0C37501CDKBZ, Evolve EWAS Wallpack Series Model EWAS010C4AF750N1FMDKBZ, Evolve LED Series Garage Light Model EG2R0A5PS5011WHITE, Evolve LED Roadway Light Model ERL1009B340AGRAY, Evolve LED Series (EAL) Area Light Model EALS020F4AF740NDD1DKBZH, Evolve LED Series (EAL) Area Light Model EAL030H4AF740NDD1DKBZ, Evolve LED Area Lighting, Canopy Light, (ECLS) Model ECLS010A5SM75011SMWHITE), Current's Albeo product line (*e.g.* Albeo High Bay Model ABV101V571NVSTKNW1PK, Albeo LED Luminaire (ALV1 Series) Model LV101V4714SNVSTKNW, Albeo LED Luminaire (Modular High & Low Bay) Model ABC1012571DQVSTKQW1PK) and Current's Lumination product line (*e.g.* Lumination LED Luminaire - Backlit Recessed Troffer Series Model BR220A2AVWHITE UL 35K, , Lumination LED Luminaire 4ft Wide Model WS-4W-0-A3-S-V-WHITE, Lumination Recessed LED Luminaire (LBT22) Model LBT22A033MM835VQLTWHITE, LED Lumination 6" Downlight Model

LRXR610830MD), and all substantially similar products (collectively, the “Accused ’268 Drivers”).

128. Claim 1 of the ’268 patent requires “a first capacitance element connected between a first terminal of the primary winding and a reference potential; and a second capacitance element connected between a first terminal of the secondary winding and the reference potential.”

129. None of the Accused ’268 Drivers have a reference potential connected to both first and second capacitance elements, as claimed in claim 1 of the ’268 patent.

130. None of the Accused ’268 Drivers have a first capacitance element connected directly between a first terminal of the primary winding and a reference potential, and a second capacitance element connected directly between a first terminal of the secondary winding and the reference potential, as claimed in claim 1 of the ’268 patent.

131. In light of at least the foregoing, the Accused ’268 Drivers do not infringe any claims of the ’268 patent.

**Count XIV**  
**(Declaration of Non-Infringement of the ’521 Patent)**

132. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

133. Signify contends that various fixtures infringe certain claims of the ’521 patent, *e.g.* claims 1, 2 and 4, including, but not limited to, Current’s Evolve product line (*e.g.* Evolve LED Series EACL Area Light (73W) Model

EACL010D4AF750NDD1DKBZ) and all substantially similar products (collectively, the “Accused ’521 Fixtures”).

134. Claim 1 of the ’521 patent requires an “upper reflector” and a “lower reflector.”

135. None of the Accused ’521 Fixtures have an “upper reflector” or a “lower reflector,” as claimed in claim 1 of the ’521 patent.

136. Claim 1 of the ’521 patent requires that “at least a portion of the upper reflector surrounds at least a portion of the lower reflector.”

137. None of the Accused ’521 Fixtures have an upper reflector wherein “at least a portion of the upper reflector surrounds at least a portion of the lower reflector,” as claimed in claim 1 of the ’521 patent.

138. Claim 1 of the ’521 patent requires that “the one or more light sources are aimed at a space between the lower reflector distal end and the upper reflector distal end.”

139. None of the Accused ’521 Fixtures have “one or more light sources are aimed at a space between the lower reflector distal end and the upper reflector distal end” as claimed in claim 1 of the ’521 patent.

140. In light of at least the foregoing, the Accused ’521 Fixtures do not infringe any claims of the ’521 patent.

**Count XV**  
**(Declaration of Non-Infringement of the ’525 Patent)**

141. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

142. Signify contends various Current LED drivers infringe certain claims of the '525 patent, *e.g.* claim 1, including, but not limited to, Current's GED100MC/VD1P700, GEO75/1050/MV-GL, D050MP25X47V1SM, D050MP25X47V2SML, D050MP5010V2SM2, GELD18DMV700PU drivers as well as the drivers within certain fixtures including, but not limited to, Current's Evolve product line (*e.g.* LED Evolve Security Light Model 48TM69, Evolve LED Canopy Area Light Model ECBB0B5F5401AWHITE, Evolve LED Wall Pack Model EWS30C7D1401DKBZ, Evolve LED Area Light (EAN) Model EANB0C37501CDKBZ, Evolve LED Flood Light (EFN) Model EFNB0A37401KCKBZ, Evolve LED Series Garage Light Model EG2R0A5PS5011WHITE, Evolve LED Area Lighting, Canopy Light, (ECLS) Model ECLS010A5SM75011SMWHITE), Current's Albeo product line (*e.g.*), Current's Arize product line (*e.g.* Arize Horticulture Batten LED Luminaire Model GEHL48HPPR1 & GEHL48HPPB1) and Current's Lumination product line (*e.g.* LRXR 8inch Downlight Model LRXR830835MD, Lumination Recessed LED Luminaire LPL22 Model LPL22C03XMM8XXVQLTWHITE, Lumination Downlight Model LRXR810840MD, Lumination Recessed LED Luminaire (LBT22) Model LBT22A033MM835VQLTWHITE, Lumination LED Recessed Luminaire Model LVT22B033MM840VOLTWHITE, Lumination LIS Series Model LISI4B042D1P35VQCSWHITE, Lumination LED Recessed Luminaire Model LVT24B040MM840VOLTWHITE, Lumination LED Recessed Luminaire Model LBT24A048MM840VQLTWHITE, Lumination 10" Downlight Model LRXR1060835MD (multi-lumen), Lumination 6" Downlight Model LRXR610830MD, Lumination LRX Gimball 6" Model LRXGR62W830MD (93138385 SERIES)

2700K/3000K/3500K), and all substantially similar products (collectively, the “Accused ’525 Drivers”).

143. Claim 1 of the ’525 patent requires a “a first series circuit between one of the input terminals and one of the output terminals including at least a self-inductance, a capacitor and a diode.”

144. None of the Accused ’525 Drivers have a “series circuit between an input terminal and an output terminal that includes at least a self-inductance, a capacitor and a diode” as claimed in claim 1 of the ’525 patent.

145. In light of at least the foregoing, the Accused ’525 Drivers do not infringe any claims of the ’525 patent.

**Count XVI**  
**(Declaration of Non-Infringement of the ’554 Patent)**

146. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

147. Signify contends that various drivers within certain fixtures infringe certain claims of the ’554 patent, *e.g.* claim 1, including, but not limited to, Current’s LRX’s product line (*e.g.* LED Downlight LRX Series Model LRXR610840MD and LRXR 8-inch Downlight Model LRXR830835MD), GE Lighting Products incorporating GE LED Lightech Driver Model GELD50MV700PVNA, Current’s Lumination product line (*e.g.* Lumination Recessed LED Luminaire LPL22 Model LPL22C03XMM8XXVQLTWHT, Lumination LRX Gimball 6” Model LRXGR62W830MD (93138385 SERIES) 2700K/3000K/3500K, LED Lumination 93138457 SERIES Model LRXDR6119WWMD 2700K/3000K/3500K, and Lumination

LED Luminaire - Backlit Recessed Troffer Series Model BR220A2AVWHITE UL 35K), and all substantially similar products (collectively, the “Accused ’554 Drivers”).

148. Claim 1 of the ’554 patent requires “a first feed-forward driver coupled to the at least one first white 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 white LED . . . .”

149. The Accused ’554 Drivers are not 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 white LED, as claimed in claim 1 of the ’554 patent.

150. In light of at least the foregoing, the Accused ’554 Drivers do not infringe any claims of the ’554 patent.

**Count XVII**  
**(Declaration of Non-Infringement of the ’706 Patent)**

151. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

152. Signify contends that various drivers within certain fixtures infringe certain claims of the ’706 patent, *e.g.* claim 1, including, but not limited to, Current’s LRX product line (*e.g.* LED Downlight LRX Series Model LRXR610840MD and LRXR1060835MD (multi-lumen)); GE Lighting Products incorporating GE LED Driver Models GE D050MP25X47V1SM, GED90MC/V2P1750S2, GE D050MP25X47V2SML, and GE D050MP5010V2SM2; LED Evolve Security Light Model 48TM69; Evolve LED Wall Pack Model EWS30C7D1401DKBZ; Evolve LED

Series Garage Light Model EG2R0A5PS5011WHITE; Evolve LED Area Lighting, Canopy Light, (ECLS) Model ECLS010A5SM75011SMWHITE; LED Lumination 10" Downlight; Lumination LED Luminaire 4ft Wide Model WS-4W-0-A3-S-V-WHITE; Lumination Recessed LED Luminaire RPL22 Model RPL22A03XMM840VQRM WHITE; and all substantially similar products (collectively, the “Accused ’706 Drivers”).

153. Claim 1 of the ’706 patent requires a “switch controller” to “process” a “third signal representing a DC voltage output by the power factor control apparatus.”

154. Claim 1 of the ’706 patent requires a “switch controller” to “process” a “fourth signal representing the predetermined desired power to be provided to the load.”

155. None of the Accused ’706 Drivers contain a switch controller that processes both a “third signal representing a DC voltage output by the power factor control apparatus” and a “fourth signal representing the predetermined desired power to be provided to the load,” as claimed in claim 1 of the ’706 patent.

156. In light of at least the foregoing, the Accused ’706 Drivers do not infringe any claims of the ’706 patent.

**Count XVIII**  
**(Declaration of Non-Infringement of the ’643 Patent)**

157. The allegations stated in the preceding paragraphs are incorporated by reference as though fully set forth herein.

158. Signify contends that various drivers within certain fixtures infringe certain claims of the ’643 patent, *e.g.* claim 1, including, but not limited to, Current’s LRX product line (*e.g.* LED Downlight LRX Series Model LRXR610840MD and LRXR 8inch Downlight Model LRXR830835MD), GE Lighting Products incorporating GE

LED Lightech Driver Model GELD50MV700PVNA, Current's Lumination product line (e.g. Lumination Recessed LED Luminaire LPL22 Model LPL22C03XMM8XXVQLTWHITE, Lumination LRX Gimball 6" Model LRXGR62W830MD (93138385 SERIES) 2700K/3000K/3500K, LED Lumination 93138457 SERIES Model LRXDR6119WWMD 2700K/3000K/3500K, and Lumination LED Luminaire - Backlit Recessed Troffer Series Model BR220A2AVWHITE UL 35K), and all substantially similar products (collectively, the "Accused '643 Drivers").

159. Claim 1 of the '643 patent requires "a first feed-forward driver coupled to the at least one first white 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 white LED."

160. The Accused '643 Drivers are not 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 white LED, as claimed in claim 1 of the '643 patent.

161. In light of at least the foregoing, the Accused '643 Drivers do not infringe any claims of the '643 patent.

#### **PRAYER FOR RELIEF**

**WHEREFORE**, for the reasons set forth above, Current respectfully requests that this Court enter judgement in its favor, and against Signify, and award relief including, but not limited to, the following:

- a) A declaration that Current has not infringed any claims of the '559, '604, '577, '268, '257, '631, '525, '703, '038, '756, '200, '845, '521, '902, '706, '643, '554 and '941 patents;
- b) A judgment awarding Current its reasonable attorneys' fees as provided for in 35 U.S.C. § 285 to the extent the Court finds this case exceptional;
- c) Costs of suit and reasonable attorneys' fees; and
- d) Such other and further relief to which Current may show itself to be entitled.

**JURY DEMAND**

Current demands trial by jury of all issues so triable in this action.

Dated: June 22, 2023

Respectfully submitted,

CURRENT LIGHTING SOLUTIONS, LLC

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