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March 8, 2021

ELECTRONIC FILING

The Honorable Lisa R. Barton
Secretary
U.S. International Trade Commission
500 E Street, SW
Washington, D.C. 20436

Re: *Certain LED Landscape Lighting Devices and Components Thereof*,
Inv. No. 337-TA-

Dear Secretary Barton:

In accordance with the Commission's Temporary Change to the Filing Procedure dated March 16, 2020, enclosed for filing on behalf of Complainant Wangs Alliance Corporation d/b/a WAC Lighting ("WAC") ("WAC" or "Complainant") are documents in support of WAC's request that the Commission commence an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended.

Complainant submits the following documents for filing via EDIS:

1. One (1) electronic copy of WAC's non-confidential verified Complaint and Statement of Public Interest, pursuant to 19 C.F.R. 210.8(a)(1)(i) and 201.8(b);
2. One (1) electronic copy of WAC's letter and certification requesting confidential treatment of the information contained in Confidential Exhibit Nos. 71C - 75C, 79C and 87C, pursuant to 19 C.F.R. 210.5(d) and 201.6(b);
3. One (1) electronic copy of the accompanying Non-Confidential Exhibits and Public versions of Confidential Exhibit Nos. 71C - 75C, 79C and 87C, pursuant to 19 C.F.R. 210.8(a)(1)(i);
4. One (1) electronic copy of the certified version of United States Patent No. 10,571,101 ("the '101 patent") and one (1) electronic copy of the uncertified version of United States Patent No 10,920,971 ("the '971 patent") (together, "the Asserted Patents")

- referenced in the Complaint as Exhibit 1 and 2, respectively (Commission Rule 210.12(a)(9)(i));¹
5. One (1) electronic copy of the uncertified versions of each of the assignment histories for the Asserted Patents cited in the Complaint as Exhibits 3-6, respectively, pursuant to Commission Rule 210.12(a)(9)(ii);
 6. One (1) electronic uncertified copy of the prosecution history of the '101 patent (Appendix A) and one (1) uncertified copy of the '971 patent (Appendix C), pursuant to Commission Rule 210.12(c)(i); and
 7. One (1) electronic copy of each patent and technical reference mentioned in the prosecution histories of the Asserted Patents, referenced in the Complaint as Appendices B and D, pursuant to Commission Rule 210.12(c)(2).

Thank you for your assistance in this matter. Please contact me if you have any questions.

Respectfully submitted,

/s/ David F. Nickel

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*Counsel for Complainant Wangs Alliance
Corporation d/b/a WAC Lighting ("WAC")*

¹ Complainant has ordered certified copies of the '971 Patent and certified copies of the assignments and prosecution histories for both of the Asserted Patents from the U.S. Patent and Trademark Office and will file them once they are received.



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March 8, 2021

ELECTRONIC FILING

The Honorable Lisa R. Barton
Secretary
U.S. International Trade Commission
500 E Street, SW
Washington, D.C. 20436

REQUEST FOR CONFIDENTIAL TREATMENT

Re: *Certain LED Landscape Lighting Devices and Components Thereof*,
Inv. No. 337-TA-

Dear Secretary Barton:

Pursuant to Commission Rules 210.5(d) and 201.6(b)(1), Complainant Wangs Alliance Corporation d/b/a WAC Lighting (“WAC” or “Complainant”), respectfully requests confidential treatment of the business information contained in Exhibit Nos. 71C – 75C, 79C and 87C to the Verified Complaint.

The information contained in the Confidential Exhibits qualifies as confidential business information pursuant to Commission Rule 201.6(a) because:

1. It is not available to the general public;
2. The disclosure of such information would cause substantial harm to WAC and to the competitive position of WAC. Specifically, the confidential exhibits contain confidential proprietary information relating to WAC’s significant domestic investments in plant, equipment, labor, and capital relating to WAC’s domestic industry products, the exploitation of the asserted patents, and proprietary information relating to WAC’s patented technology; and
3. Unauthorized disclosure of the information could impair the Commission’s ability to obtain information necessary to perform its statutory function.

Thank you for your attention to this matter. Please contact me if you have any questions regarding this submission.

The Honorable Lisa R. Barton
March 8, 2021
Page 2

Respectfully submitted,

/s/ David F. Nickel

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*Counsel to Complainant Wangs Alliance
Corporation d/b/a WAC Lighting ("WAC")*

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON D.C.**

In the Matter of

**CERTAIN LED LANDSCAPE
LIGHTING DEVICES AND
COMPONENTS THEREOF**

Investigation No. 337-TA-_____

**COMPLAINANT WANGS ALLIANCE CORPORATION D/B/A WAC
LIGHTING'S STATEMENT ON THE PUBLIC INTEREST**

Pursuant to 19 C.F.R. § 210.8(b), Complainant Wangs Alliance Corporation d/b/a WAC Lighting (“WAC”) respectfully submits this Statement Regarding the Public Interest with respect to the remedial orders it seeks against Proposed Respondents CAST Lighting LLC (“CAST”); Shenzhen Wanjia Lighting Co., Ltd. d/b/a WONKA (“Wonka”); cBright Lighting, Inc. (“cBright”); Dauer Manufacturing Corp. and FUSA Corp. (together “Dauer Respondents”); and Lumien Enterprise, Inc. d/b/a Lumien Lighting and Jiangsu Sur Lighting Co., Ltd. (together “Lumien Respondents”) (collectively “Proposed Respondents”). WAC seeks a permanent limited exclusion order excluding from entry into the United States certain LED landscape lighting devices and components thereof that infringe one or more claims of U.S. Patent No. 10,571,101 and U.S. Patent No. 10,920,971 (together, “the Asserted Patents”). WAC also seeks permanent cease and desist orders prohibiting Proposed Respondents, their subsidiaries, related companies, and agents from engaging in the importation, sale for importation, marketing and/or advertising, distribution, offering for sale, sale, use after importation, sale after importation, or other transfer within the United States of certain LED landscape lighting devices and components thereof, that infringe one or more claims of the Asserted Patents. As discussed more fully below, the requested remedial orders are not contrary to the public interest.

Exclusion of such products from the United States will not have an adverse effect on the public health and welfare in the United States, competitive conditions in the United States economy, the production of like or directly competitive articles in the United States, or United States' consumers.

I. How the Articles Potentially Subject to the Requested Remedial Orders Are Used in the United States

This Investigation implicates certain LED landscape lighting devices and components commonly used by residential and commercial consumers, which infringe the Asserted Patents as detailed in the Complaint and accompanying exhibits (the "Accused Products").

II. The Requested Remedial Orders Pose No Public Health, Safety, or Welfare Concerns

Excluding the Accused Products would not "deprive the public of products necessary for some important health or welfare need." *Spansion, Inc. v. U.S. Int'l Trade Comm'n*, 629 F.3d 1331, 1360 (Fed. Cir. 2010). For instance, the Accused Products are not pharmaceuticals or essential equipment for medical treatment, *see Spansion*, 629 F.3d at 1360, and excluding the Accused Products would not deprive the American public of access to any product that "provide[s] benefits unavailable from any other device or method of treatment." *Certain Fluidized Supporting Apparatus & Components Thereof*, Inv. No. 337-TA-182/188, USITC Pub. 1667, Comm'n Op. at 23-25 (Oct. 5, 1984). The requested remedial orders raise no public interest concerns at least because: (1) the accused products are LED landscape lighting devices and components that do not raise significant public health, safety, or welfare concerns; (2) the Asserted Patents are not standard-essential patents; (3) WAC and third parties sell articles that directly compete with, and are substitutes for Proposed Respondents' Accused Products in the United States; and (4) the production capacity of WAC and other third parties could fill any void

in the market. Accordingly, the strong public interest in protecting WAC's intellectual property rights outweighs any potentially adverse impact on the public.

III. Like or Directly Competitive Articles Are Available To Satisfy Demand for Excluded Accused products

No public interest concerns exist where the market contains an adequate supply of competitive or substitute products for those subject to a remedial order. *See, e.g., Certain Lens Fitted Film Packages*, Inv. No. 337-TA-406, Comm'n Op. at 18 (June 28, 1999). Here, Proposed Respondents represent only a portion of a competitive market for the manufacture and sale of LED landscape lighting products. Complainant and other entities not subject to this Investigation adequately supply the market and will continue to do so even if the requested remedial orders are issued.

IV. There Is Sufficient Capacity To Replace Excluded Accused Products

The presence of an adequate supply of substitute products is sufficient to override and public interest concerns. *Id.* Complainant and others have the capacity to replace the Proposed Respondents' volume of production of Accused Products for the United States market without delay. Consequently, consumers could obtain non-infringing LED landscape lighting products from Complainant and third parties in amounts sufficient to meet demand should the Accused Products be excluded from the United States. Accordingly, Proposed Respondents' Accused Products could and would be replaced by the market if the relief sought were granted. This obviates any potential adverse impact the requested remedial orders might otherwise have on the public.

V. The Remedy Has No Relevant Public Interest Impact on U.S. Consumers

The requested Remedial Orders would not materially or negatively impact United States consumers. Notwithstanding the relief sought herein, consumers would continue to have a wide

array of options for LED landscape lighting products in the United States, including those supplied by Complainants, as well as other non-infringing LED landscape lighting products. Indeed, the requested relief will serve the public interest by enforcing United States intellectual property rights. Precluding the Proposed Respondents from importing and selling their infringing LED landscape lighting devices and components thereof will benefit the public interest by protecting innovators who invest domestically to research and develop new energy-efficient technology. *See, e.g., Certain Baseband Processor Chips & Chipsets, Transmitter & Receiver (Radio) Chips, Power Control Chips, & Prods. Containing Same, Including Cellular Tel. Handsets*, Inv. No. 337-TA-543, Comm’n Op. at 136–37 (June 19, 2007).

Conclusion

The public interest will be served in the event the Commission grants the requested remedial orders. The Accused Products are not necessary to any health, safety, or welfare need. Further, an adequate supply of high-quality substitute articles is available through WAC. Third parties can also supply non-infringing products. As such, the public interest in protecting WAC’s intellectual property rights heavily outweighs any potential adverse impact on the public. For the foregoing reasons, there are no public interest concerns that would preclude the Commission from issuing the remedial orders requested by the Complainant.

Date: March 8, 2021

Respectfully Submitted,

/s/ David F. Nickel

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**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON D.C.**

In the Matter of

**CERTAIN LED LANDSCAPE
LIGHTING DEVICES AND
COMPONENTS THEREOF**

Investigation No. 337-TA-_____

**COMPLAINT OF WANGS ALLIANCE CORPORATION D/B/A WAC LIGHTING
UNDER SECTION 337 OF THE TARIFF ACT OF 1930, AS AMENDED**

COMPLAINANT

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cBright Lighting, Inc.
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Telephone: (855) 993-9200

Dauer Manufacturing Corp.
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FUSA Corp.

	<p>10100 NW 116th Way Suite #14 Medley, Florida 33178 Telephone: (800) 883-2590</p> <p>Lumien Enterprise, Inc. d/b/a Lumien Lighting 322 Northpoint Parkway SE, Suite J Acworth, Georgia 30102 Telephone: (770) 485-9002</p> <p>Jiangsu Sur Lighting Co., Ltd. South-eastern industrial zone, Yancheng, Jiangsu Province, 224050 China 86 (515)-6899-5898</p>
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NON-CONFIDENTIAL EXHIBIT LIST

Exhibit	Description
1.	Certified Copy of U.S. Patent No. 10,571,101
2.	Copy of U.S. Patent No. 10,920,971
3.	Certified Copy of Assignment Documents for U.S. 10,571,101 Reel 50835/143
4.	Copy of Assignment Documents for U.S. 10,571,101 Reel 54964/689
5.	Copy of Assignment Documents for U.S. 10,920,971 Reel 54050/697
6.	Copy of Assignment Documents for U.S. 10,920,971 Reel 54964-689
7.	2016 CEE Lighting for Tomorrow Awards - Functional Fixture Awards Winner - WAC Lighting Landscape Accent Light
8.	2016 Lighting for Tomorrow (LFT) Competition Awards Announced - enLIGHTenment
9.	Page from WAC Website - Our Story
10.	Photo of WAC Lighting, 44 Harbor Park Drive
11.	Page from WAC Website - Contact Us
12.	Page from WAC – Website - Home Page
13.	Page from CAST Lighting Website - About Page
14.	Page from CAST Lighting Website - SLABL1 Product Page
15.	Page from CAST Lighting Website - Home Page
16.	Page from Wonka Website - SD31A Product Page
17.	Page from Wonka Website - About Us
18.	Page from Wonka Website - Brass Garden Light Case 2
19.	Page from Wonka Website - Contact Us Page
20.	Page from Wonka Website - Home Page
21.	Page from cBright Website - Contact Us
22.	Page from cBright Website - Home Page

23. Page from cBright Website - SD31A Dyno Classic Product Page
24. Page from cBright Website - About Us
25. Page from cBright Website - Outdoor Lighting Products Page
26. *Reserved*
27. Page from Dauer Manufacturing Website - About Us Page
28. Page from Dauer Manufacturing Website - Contact Us Page
29. Page from FUSA Website - Contact Us Page
30. Page from FUSA Website - Home Page
31. Page from Dauer Manufacturing Website - Home Page
32. Page from Dauer Manufacturing Website - Sku 490098 Accu-Flood Integrated LED Uplight Product Page
33. Page from Dauer Manufacturing Website - Uplights Product Page
34. Page from Lumien Website - D5A1-aW Product Page
35. Page from Lumien Website - D6B1-aW Product Page
36. Page from Jiangsu Sur Lighting Co., Ltd. Website - About US Page
37. Page from Jiangsu Sur Lighting Co., Ltd. Website - Contact Us Page
38. Page from Jiangsu Sur Lighting Co., Ltd. Website - Home Page
39. Page from Lumien Website - USA About Us Page
40. Page from Lumien Website - USA Contact Us
41. Page from Lumien - USA Home Page
42. SLC Source Lighting Co., SBLAB1-SD31C Specification Sheet
43. SLC Source Lighting Co., Landscape Lighting Interactive Brochure
44. SLC Source Lighting Co., Spot Light Installation Instructions
45. Accu-Flood Integrated LED Uplight 490098 Specification Sheet
46. Dauer Manufacturing - Brochure
47. Dauer Manufacturing Model 490098 “Accu-Flood White” Instructions

48. Lumien - D5 Instructions 1
49. Lumien - D5 Instructions 2
50. Lumien - D6 Instructions 1
51. Lumien - D6 Instructions 2
52. Lumien - D6 Instructions 3
53. cBright SD31A Dyno Classic Landscaping Light Specification Sheet
54. Wikipedia - IP Code
55. XL6006 XLSEMI Datasheet
56. ZXLD1370 Diodes Datasheet
57. Claim Chart: Infringement of Claims 1-3, 6, 8-13, 18 of the '101 Patent by CAST's SBLABL1
58. Claim Chart: Infringement of Claims 1, 7-9 of the '971 Patent by CAST's SBLABL1
59. Claim Chart: Infringement of Claims 1-3, 6, 8-13, 18 of the '101 Patent by Dauer Respondents' 490098
60. Claim Chart: Infringement of Claims 1, 7-9 of the '971 Patent by Dauer Respondents' 490098
61. Claim Chart: Infringement of Claims 1-3, 6, 8-13, 18 of the '101 Patent by cBright Respondents' SD31A
62. Claim Chart: Infringement of Claims 1, 7-9 of the '971 Patent by cBright Respondents' SD31A
63. Claim Chart: Infringement of Claims 1-6, 8-13, 18 of the '101 Patent by Lumien Respondents' D5A1-aW
64. Claim Chart: Infringement of Claims 1, 7-9 of the '971 Patent by Lumien Respondents' D5A1-aW
65. Claim Chart: Infringement of Claims 1-6, 8-13, 18 of the '101 Patent by Lumien Respondents' D6B1-aW-LGLSP0807IP
66. Claim Chart: Infringement of Claims 1, 7-9 of the '101 Patent Patent by Wonka's SD31A

67. Claim Chart: Infringement of Claims 1-3, 6, 8-13, 18 of the '971 Patent by Wonka's SD31A
68. Claim Chart: Infringement of Claims 1-3, 6, 8-13, 18 of the '101 Patent by Wonka's SD31C
69. Claim Chart: Infringement of Claims 1, 7-9 of the '971 Patent by Wonka's SD31C
70. *Reserved*
71. Public Version of Photographs and Transaction Records for Purchase of CAST's SBLABL1
72. Public Version of Photographs and Transaction Records for Purchase of Dauer Respondents' 490098
73. Public Version of Photographs and Transaction Records for Purchase of Lumien Respondents' D5.
74. Public Version of Photographs and Transaction Record for Purchase of Purchase of Lumien Respondents' D6
75. Public Version of Photographs and Transaction Records for Purchase of cBright's SD31A.
76. *WAC v. Cast Lighting LLC*, Case No. 2:20-cv-03710-MCA-MAH (D.N.J.) - Dkt. No. 6, Answer to Complaint dated May 5, 2020.
77. *WAC v. Cast Lighting LLC*, Case No. 2:20-cv-03710-MCA-MAH (D.N.J.) - CAST Response to WAC's First Set of Interrogatories, dated August 10, 2020.
78. *WAC v. Cast Lighting LLC*, Case No. 2:20-cv-03710-MCA-MAH (D.N.J.) - CAST Supplemental Interrogatory Responses, dated Sept. 21, 2020.
79. Public Version of Transaction Records for Purchase of Dauer 490098
80. CAST - SD31C Purchase Orders
81. CAST-Wonka Supply Agreement
82. Picture of SBLABL1 Stake
83. Claim Chart: Practice of Claim 1 of the '101 Patent by WAC's 6111 LED Landscape Lighting Device
84. Claim Chart: Practice of Claim 1 of the '971 Patent by WAC's 6111 LED Landscape Lighting Device

- 85. WAC - 5111 / 6111 / 6211 Installation Instructions
- 86. WAC – 6111 / 6211 Specification Sheet
- 87. Public Version of WAC Domestic Industry Exhibit
- 88. PTO Email Confirming Approval of Certificate of Correction for U.S. Patent No. 10,920,971

CONFIDENTIAL EXHIBIT LIST

- 71C. CONFIDENTIAL Photographs and Transaction Records for Purchase of CAST's SBLABL1
- 72C. CONFIDENTIAL Transaction Records for Purchase of Dauer Respondents' 490098
- 73C. CONFIDENTIAL Photographs and Transaction Records for Purchase of Lumien Respondents' D5
- 74C. CONFIDENTIAL Photograph and Transaction Records for Purchase of Lumien Respondents' D6
- 75C. CONFIDENTIAL Photographs and Transaction Records for Purchase of cBright's SD31A
- 79C. CONFIDENTIAL Email Correspondence re Dauer Product dated Feb. 5, 2021
- 87C. CONFIDENTIAL WAC Domestic Industry

Appendices

Ex.	Description
A	Certified Copy of Prosecution History of U.S. Patent No. 10,571,101 File Wrapper 16/582,660
B	Copies of References Cited in Prosecution History of U.S. Patent No. 10,571,101
C	[Pending Certified Copies] Prosecution History of U.S. Patent No. 10,920,971 File Wrapper 16/780,060
D	Copies of References Cited in Prosecution History of U.S. Patent No. 10,920,971

I. Introduction

1. This Complaint is filed by Complainant Wangs Alliance Corporation d/b/a WAC Lighting (“WAC”) pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337 (“Section 337”).

2. For over thirty-five years, WAC, a family company, has operated in the United States at the forefront of emerging technologies, producing quality LED lighting solutions that are energy-efficient, long-lasting, and maintenance-free, and promoting green technology. WAC’s investment in electronics development, research and test laboratories, and assembly facilities has culminated into a unique and unparalleled world-class brand, renowned for quality and ingenuity in the industry. Instead of acquiring patents from other market players and copying existing products, WAC has been dedicated to charting its own path of innovation, bringing to the industry new and unique designs and technologies. WAC’s portfolio of patents protects these proprietary designs and technologies.

3. WAC brings this action seeking relief under Section 337 to prevent the unlawful importation into the United States, the sale for importation, and the sale within the United States after importation of certain LED landscape lighting devices and components thereof that infringe certain claims of U.S. Patent No. 10,571,101 (“the ’101 Patent”) and U.S. Patent No. 10,920,971 (“the ’971 Patent”) (together, “the Asserted Patents”). A complete listing of the claims asserted by WAC in this investigation (collectively, “the Asserted Claims”) is shown below with the independent claims shown in **bold**:

Patent	Claims
’101	1 -6, 8-10, 11 , 12-13, 18
’971	1 , 7 , 8, 9

Table 1. Asserted claims for infringement

4. The proposed Respondents are CAST Lighting LLC (“CAST”); Shenzhen Wanjia Lighting Co., Ltd. d/b/a WONKA (“Wonka”); cBright Lighting, Inc. (“cBright”); Dauer Manufacturing Corp. (“Dauer Manufacturing”) and FUSA Corp. (“FUSA”) (together “the Dauer Respondents”); and Lumien Enterprise, Inc. d/b/a Lumien Lighting (“Lumien Lighting”) and Jiangsu Sur Lighting Co., Ltd. (“JSL”) (together “the Lumien Respondents”).

5. Electronic versions of a certified copy of the ’101 Patent (Ex. 1) and an uncertified¹ copy of the ’971 Patent (Ex. 2) are attached to this Complaint.² As shown in the electronic copies³ of the assignments for the ’101 Patent (Exs. 3-4) and uncertified assignments of the ’971 Patent (Exs. 5-6), WAC owns the entire right, title, and interest in and to the ’101 Patent and the ’971 Patent. Electronic versions of the certified copy of the prosecution history of the ’101 Patent, an uncertified copy of the prosecution history of the ’971 Patent, and technical references cited in the ’101 Patent and the ’971 Patent are also being submitted with this Complaint (Appendices A-D).

6. A domestic industry, as required by 19 U.S.C. § 1337(a)(2) and (3), exists in the United States relating to articles and/or technology protected by the Asserted Patents. This industry is supported by WAC’s significant and substantial domestic investments in plant,

¹ To the extent uncertified copies are not submitted with the Complaint, they have been ordered and will be filed as soon as they are available.

² On February 16, 2021, WAC filed a request for issuance of a certificate of correction to correct errors in some of the claims of the ’971 Patent due to errors of the U.S. Patent Office. Appendix C at WAC-002468-73. That request was granted on March 1, 2021. Ex. 88. The certificate of correction is expected to issue by the end of March. All of the claim charts for the ’971 Patent attached hereto, reflect the claims as they will be corrected upon issuance of the certificate of correction. Once issued, a certified copy of the certificate of correction will be filed.

³ Exhibit 3 is a certified copy of Reel 50835/143 of the assignment documents of the ’101 Patent and Exhibit 4 is an uncertified copy of Reel 54964/689 of the assignment documents of the ’101 Patent.

equipment, labor, and capital in connection with WAC's LED landscape lighting devices and components thereof (WAC's "DI Products") protected by the Asserted Patents.

7. WAC seeks, as relief, a permanent limited exclusion order pursuant to 19 U.S.C. § 1337(d), barring from entry into the United States LED landscape lighting devices and components thereof that infringe one or more claims of the Asserted Patents and are imported by or on behalf of CAST, Wonka, cBright, the Dauer Respondents, and the Lumien Respondents. WAC also seeks cease and desist orders, pursuant to 19 U.S.C. § 1337(f), against each of CAST, Wonka, cBright, the Dauer Respondents, and the Lumien Respondents, directing CAST, Wonka, cBright, the Dauer Respondents, and the Lumien Respondents and their parent entities, subsidiaries, affiliates, related entities, agents, distributors, importers, or consignees (or agents thereof) from engaging in activities including, but not limited to, importing, marketing, advertising, demonstrating, warehousing inventory for distribution, offering for sale, selling, distributing, licensing, or using LED landscape lighting devices and components thereof that infringe one or more claims of the Asserted Patents. Additionally, WAC requests the imposition of a bond pursuant to 19 U.S.C. § 1337(j), for any activities otherwise covered by the limited exclusion order and/or permanent cease and desist orders, during the period of Presidential review of the Commission's remedial orders.

II. The Parties

A. The Complainant

8. The Complainant Wangs Alliance Corporation d/b/a WAC Lighting ("WAC") is a corporation duly organized and existing under the laws of the state of New York with its principal place of business located at 44 Harbor Park Drive, Port Washington, New York 11050. WAC also has offices in Ontario, California and Lithia Springs, Georgia, and a showroom in Dallas, Texas.

9. A family company, WAC is headquartered in the United States. For over thirty-five years, WAC has operated in the United States at the forefront of emerging technologies, producing quality LED lighting solutions that are energy-efficient, long-lasting, and maintenance-free, and promoting green technology. *See* Ex. 9.

10. WAC elevates the industry in design and manufacturing by challenging conventions and building sustainable products responsibly. Over the years, its investment in electronics development, research and test laboratories, and assembly facilities has culminated into a unique and unparalleled world-class brand, renowned for quality and ingenuity in the industry. Its award-winning portfolio of architectural products, decorative lighting, and landscape lighting focuses on addressing known problems or meeting unfulfilled needs with lighting solutions in commercial, residential, and hospitality settings. *See* Ex. 9.

11. To achieve this success and remain among the industry's leaders, WAC has been for many years investing in research and developing its own intellectual property. Instead of acquiring patents from other market players and copying existing products, WAC has been dedicated to charting its own path of innovation, bringing to the industry new and unique designs and technologies. WAC's portfolio of patents protects these proprietary designs and technologies. Its patents play an important role in maintaining WAC's brand and reputation as an innovator and a visionary in the LED luminaire space. WAC therefore takes protection of its intellectual property very seriously and is determined to put a stop to any unauthorized copying or stealing of its patented technology by others, by any lawful means at its disposal.

12. Among WAC's innovations are several novel award-winning landscape lighting products, which are protected by WAC's patents, including the Asserted Patents. *See* Exs. 7-8.

B. The Proposed Respondents

1. Respondent CAST Lighting LLC (“CAST”)

13. CAST is a New Jersey limited liability company with its principal place of business at 1120-A Goffle Rd., Hawthorne, NJ 07506. Upon information and belief, CAST’s Accused Products are manufactured abroad and CAST sells for importation, imports, and/or sells its Accused Products in the United States after importation. CAST’s website describes its LED landscape lighting devices. *See* Exs. 14, 15.

2. Respondent Shenzhen Wanjia Lighting Co., Ltd. d/b/a WONKA (“Wonka”)

14. Wonka is a privately held Chinese company with its principal place of business at 7/F Zhongxinbao Industry Park, No.101 Fucheng’ao Industry Road, Pinghu Town, Longgang District, Shenzhen 518111, China. Upon information and belief, Wonka manufactures its products in China, sells for importation, imports, and/or sells its Accused Products in the United States after importation. *See* Exs. 16, 17.

3. Respondent cBright Lighting, Inc. (“cBright”)

15. cBright is a privately held company with its principal place of business at 15010 Wicks Blvd., San Leandro, CA 94577. Upon information and belief, cBright’s Accused Products are manufactured abroad and cBright sells for importation, imports, and/or sells its Accused Products in the United States after importation. *See* Exs. 23, 24.

4. Respondent Dauer Manufacturing Corp. (“Dauer Manufacturing”) and Respondent FUSA Corp. (“FUSA”) (collectively, “the Dauer Respondents”)

16. Dauer Manufacturing is a privately held company with its principal place of business at 10100 NW 116 Way, Suite 14, Medley, FL 33178. Upon information and belief, Dauer Manufacturing’s Accused Products are manufactured abroad and Dauer Manufacturing

sells for importation, imports, and/or sells its Accused Products in the United States after importation. *See* Exs. 27, 32.

17. FUSA Corp. is the corporate parent or affiliate of Dauer Manufacturing Corp. *See* Ex. 30. Upon information and belief, FUSA was incorporated in Florida in 2002. According to FUSA's website, FUSA's headquarters is located at 10100 NW 116 Way, Suite 14, Medley, FL 33178. Ex. 29. Upon information and belief, FUSA's Accused Products are manufactured abroad and FUSA sells for importation, imports, and/or sells its Accused Products in the United States after importation. Exs. 27, 32. Upon information and belief, FUSA sells for importation, imports, and/or sells its Accused Products through its subsidiary Dauer Manufacturing. *See* Ex. 30.

5. Respondent Lumien Enterprise, Inc. d/b/a Lumien Lighting ("Lumien Lighting") and Respondent Jiangsu Sur Lighting Co., Ltd. ("JSL") (collectively, "the Lumien Respondents")

18. Lumien Lighting is a privately held company with its principal place of business at 322 Northpoint Parkway SE, Suite J, Acworth, GA 30102. Upon information and belief, Lumien Lighting's Accused Products are manufactured abroad, and Lumien Lighting sells for importation, imports, and/or sells its Accused Products in the United States after importation. *See* Exs. 34-35, 39.

19. JSL is the corporate parent of Lumien Lighting. Upon information and belief, JSL is a corporation organized and existing under the laws of China and has a place of business located at South-eastern Industrial Zone, Tinghu District, Yancheng, 224000 Jiangsu Province 224050, China. Upon information and belief, JSL manufactures its Accused Products in China, sells for importation, imports, and/or sells its Accused Products in the United States after importation. Upon information and belief, JSL manufactures its Accused Products in China,

sells for importation, imports, and/or sells its Accused Products through its subsidiary Lumien Lighting. *See* Exs. 34-35, 39.

III. Products at Issue—LED Landscape Lights

20. Pursuant to Commission Rule 210.12(a)(12), the products at issue are LED landscape devices, fixtures, and components thereof, including LED drivers, LED modules, housings and optics. The products at issue are lights and fixtures that allow user adjustable light power settings and variable beam angles in a housing that protects the assembly from the elements. The products obviate the need for an installer and disassembly, to make the aforementioned adjustments.

21. Exterior LED lighting often involves illuminating different areas of an outdoor environment with different amounts of light, with lights of different colors and/or with lights that have beams of different widths. Often spotlights are used to illuminate particular features or elements of the outdoor environment. The technology at issue relates to user-adjustable, waterproof landscape or exterior light fixtures. Landscape fixtures may be deployed in a range of outdoor settings—where they are exposed to the elements, including water, dirt, heat/cold, and corrosion—and serve a range of needs and applications, *e.g.*, wider or narrower beam angles, aimed in different directions, at different light intensities, *etc.* Historically, exterior lights were adjusted in the field by an installer partially disassembling the fixture during installation and adjusting the necessary components, creating an opportunity for contaminants to be introduced into the fixture and otherwise compromising the integrity of the fixture. The Asserted Patents describe a novel set of watertight, user-adjustable LED lights employing on-board dimming controls and beam-angle changing mechanisms that obviate the need for an installer and disassembly, all while withstanding outdoor conditions.

A. Complainant's Products

22. Beginning in 2016, WAC introduced a line of LED Landscape lighting products with integral brightness control and easily-adjustable beam angles in robust housings that protect against the elements. The product line is all based upon a set of similar designs and consists of the Accent Series (5011 and 5012 products), the Wall Wash Series (5021 and 5022 products), the Inground Series (5031 and 5032 products), the Mini Accent Series (5111 products), the Grand Accent Series (5211 and 5212 products), the Adjustable Beam Wall Wash Series (5221 and 5222 products), and the Mini Accent Path Series (6111 and 6211 products). Exemplary DI Products, the Mini Accent Series 5111 and the Mini Accent Path Series 6111, are depicted below.

	
Mini Accent Series 5111	Mini Accent Path Series 6111

B. Respondents' Products

23. Respondents' Accused Products are LED Landscape lights that similarly provide for user-adjustable light power settings and variable beam angles in a housing that protects the assembly from the elements. The Accused Products are manufactured in China and imported

into the United States for sale. The Accused Products incorporate the patented technology claimed in the Asserted Patents. Examples of the Accused Products are shown below:

				
CAST SBLBLA1 / Wonka SD31C	cBright SD31A / Wonka SD31A	Dauer 490098 / Wonka SD31A	Lumien D5A1- aW	Lumien / JSL D6B1-aW

IV. The Asserted Patents

A. Identification of the Patents and Ownership by WAC

24. WAC asserts two patents in this Investigation: the '101 Patent and the '971 Patent.

1. The '101 Patent

25. The '101 Patent, entitled "LED Lighting Methods and Apparatus," issued on February 25, 2020. *See* Ex. 1 ('101 Patent). The '101 Patent is based on U.S. Patent Application No. 16/582,660, filed on September 25, 2019. *See id.* The '101 Patent is a continuation of U.S. Patent Application No. 16/444,287, filed on June 18, 2019, now U.S. Patent No. 10,465,888, which is a continuation of U.S. Patent Application No. 15/001,206, filed on January 19, 2016, now U.S. Patent No. 10,465,832. *See id.* The '101 Patent claims priority to U.S. Provisional Application Ser. Nos. 62/267,899, filed on December 15, 2015; Ser. Nos. 62/269,751, filed on

December 18, 2015; Ser. Nos. 62/270,517, filed on December 21, 2015; Ser. Nos. 62/280,114, filed on January 18, 2016. *See id.* The '101 Patent expires on January 19, 2036.

26. WAC owns by assignment the entire right, title, and interest in the '101 Patent. *See* Exs. 3-4.

27. The '101 Patent has two independent claims and eighteen dependent claims including asserted independent claims 1 and 11 and asserted dependent claims 2-6, 8-10, 12-13, and 18. A table identifying the claims of the '101 Patent asserted against each Respondent is provided below. This Complaint is accompanied by an electronic version of a certified copy of the prosecution history of the '101 Patent and an electronic copy of each reference cited on the face of the '101 Patent or mentioned in the prosecution history. *See* Appendices A-B.

	Asserted Claims
CAST	1-3, 6, 8-13, 18
WONKA	1-3, 6, 8-13, 18
CBRIGHT	1-3, 6, 8-13, 18
DAUER	1-3, 6, 8-13, 18
LUMIEN	1-6, 8-13, 18

Table 2. Asserted Claims of the '101 Patent

2. The '971 Patent

28. The '971 Patent, entitled "LED Lighting Methods and Apparatus," issued on February 16, 2021. *See* Ex. 2 ('971 Patent). The '971 Patent is based on U.S. Patent Application No. 16/780060, filed on February 3, 2020. *See id.* The '971 Patent is a continuation of U.S. Patent Application No. 16/452,225, filed on June 25, 2019, now U.S. Patent No. 10,598,358, which is a continuation of U.S. Patent Application No. 15/001,207, filed on January 19, 2016, now U.S. Patent No. 10,330,294. *See id.* The '971 Patent claims priority to U.S. Provisional Application Ser. Nos. 62/267,899, filed on December 15, 2015; Ser. Nos. 62/269,751, filed on

December 18, 2015; Ser. Nos. 62/270,517, filed on December 21, 2015; and Ser. Nos. 62/280,114, filed on January 18, 2016. *See id.* The '971 Patent expires on January 19, 2036.

29. WAC owns by assignment the entire right, title, and interest in the '971 Patent. *See* Exs. 5-6.

30. The '971 Patent has three independent claims and eleven dependent claims. In this Investigation, independent claims 1, 7, and 9 and dependent claim 8 of the '971 Patent are asserted against Respondents. A table identifying the claims asserted against each Respondent is provided below. This Complaint is accompanied by an electronic uncertified copy of the prosecution history of the '971 Patent and an electronic copy of each reference cited on the face of the '971 Patent or mentioned in the prosecution history. *See* Appendix C.

	Asserted Claims
CAST	1, 7-9
WONKA	1, 7-9
CBRIGHT	1, 7-9
DAUER	1, 7-9
LUMIEN	1, 7-9

Table 3. Asserted Claims of the '971 Patent

B. Non-Technical Description of the Asserted Patents⁴

31. The Asserted Patents are related and share the same specification and figures.

32. The Asserted Patents are generally directed, among other things, to user-adjustable, waterproof landscape or exterior light fixtures. Ex. 1 at 1:27-55.⁵ In general terms,

⁴ This description and any other non-technical descriptions in this Complaint are for illustrative purposes only. Nothing in any non-technical description contained within this Complaint is intended to, either implicitly or explicitly, express any position regarding the proper construction of any claim of the Asserted Patents.

⁵ The pin cites to the patent specification are provided based on the '101 Patent.

landscape fixtures may be deployed in a range of outdoor settings and serve a range of needs and applications – *e.g.*, wider or narrower beam angles, aimed in different directions, at different light intensities, *etc.* *Id.* at 1:28-32. Furthermore, landscape fixtures are subject to exposure to the elements, including water, dirt, heat/cold, and corrosion. *Id.* at 1:40-44. Historically, outdoor lights were adjusted in the field by an installer partially disassembling the fixture during installation and adjusting the necessary components, creating an opportunity for contaminants to be introduced into the fixture and otherwise compromising the integrity of the fixture. *Id.*

33. The Asserted Patents describe a novel set of watertight, user-adjustable LED lights employing on-board dimming controls and beam-angle changing mechanisms that obviate the need for an installer and disassembly, all while withstanding outdoor conditions. *Id.* at 1:59-2:11.

34. The '101 Patent claims particular configurations of components that resolve many of the problems associated with prior art fixtures. The claimed fixture includes a housing (an enclosure) with a specific design, a light-emitting diode ("LED"), a driver (a circuit that powers the LED), an on-board mechanism for manually adjusting the brightness of the LED, a water seal and an internal insulating layer that protect the interior components. These specifically claimed configurations allow the user to adjust the output of the fixture (*i.e.*, make it dimmer or brighter) as well as other parameters (*e.g.*, direction of the light) in the field without endangering the fixture's integrity.

35. The '971 Patent claims other configurations of components that resolve many of the problems associated with prior art fixtures. The '971 Patent claims a ground-anchorable fixture comprising a monolithic housing which includes in it both an LED and a driver (a circuit

that powers the LED), an on-board mechanism for manually adjusting the brightness of the LED, and a mechanism that allows the beam angle of the light emitted by the fixture to change.

C. Foreign Counterparts of the Asserted Patents

36. The Asserted Patents do not have foreign counterparts, nor do they have any corresponding foreign patent applications that have been denied, abandoned, or withdrawn.

D. Licenses

37. The Asserted Patents have not been licensed.

V. Unlawful and Unfair Acts of Proposed Respondents—Importation and Patent Infringement

38. Respondents are engaged in the unlawful importation into the United States, sale for importation, and/or sale within the United States after importation of certain LED landscape lighting devices and components thereof, that infringe at least the Asserted Claims of the Asserted Patents. These activities constitute a violation of Section 337. Specific examples of infringing products offered for sale for importation, imported into and sold within the United States by or on behalf of Respondents are set forth below in detail.

A. CAST

39. The accused CAST products are LED landscape lighting devices and components thereof, including the exemplary Adjustable Beam/Lumen Spot Light SBLABL1 (sold under CAST's Source Lighting Co. brand), and other substantially similar LED landscape lighting devices, that infringe certain claims of the Asserted Patents (the "CAST Accused Products"). Upon information and belief, the CAST Accused Products are manufactured in China, imported into the United States, and then sold in the United States after importation.

40. Upon information and belief, CAST has infringed and continues to infringe, directly and/or indirectly, at least the Asserted Claims of each of the Asserted Patents set forth

below. Upon information and belief, CAST infringes the Asserted Claims of the Asserted Patents literally and/or under the doctrine of equivalents by making and selling products that infringe, by importing those products into the United States, and/or by selling those products within the United States after importation.

41. The following table summarizes the claims asserted against CAST:

Patent	Asserted Claims
'101	1-3, 6, 8-13, 18
'971	1, 7-9

Table 4. Claims asserted against CAST

1. Importation

42. Exemplary instances of importation, sale, and offers for sale of the CAST Accused Products that infringe the Asserted Patents are set forth below.

43. Upon information and belief, CAST has the CAST Accused Products manufactured in China, imports these products, and sells them in the United States directly and/or through third parties. It does so at least through its commercial relationship with Wonka with whom CAST has contracted to manufacture accused LED landscape lighting products on its behalf in China. Ex. 81.

44. In addition, in *Wangs Alliance Corporation d/b/a WAC Lighting v. CAST Lighting LLC*, No. 2:20-cv-03710-MCA-MAH (D.N.J.) (the “D.N.J. Case”), CAST admitted in both its Answer to the Complaint and interrogatory responses that it imports the CAST Accused Products from Wonka in China and sells them after importation in the United States. *See* Exs. 76-78.

45. Finally, the CAST Accused Products are labeled as manufactured in China and have been purchased in the United States, further demonstrating that CAST’s products are

imported and sold after importation in the United States. *See* Exs. 71, 82.



2. Infringement of the '101 Patent

46. Upon information and belief, CAST directly infringes Asserted Claims 1-3, 6, 8-13, and 18 of the '101 Patent by having made, selling for importation, importing into the United States, and/or selling within the United States the CAST Accused Products.

47. CAST has had actual knowledge of the '101 Patent since at least the service of the Complaint in the D.N.J. case in April 2020.

48. Upon information and belief, CAST induces its customers to infringe Asserted Claims 1-3, 6, 8-13, and 18 of the '101 Patent with the specific intent to encourage their infringement by, among other things, marketing, creating, and/or distributing specifications, marketing materials, manuals, installation instructions, data sheets, application notes, and/or similar materials with instructions on using or rendering operable the CAST Accused Products. Upon information and belief, CAST's customers who purchase the CAST Accused Products and

use or re-sell the CAST Accused Products infringe the Asserted Claims. Upon information and belief, CAST knew or should have known that the induced acts constitute direct infringement.

49. A chart that applies Asserted Claims 1-3, 6, 8-13 and 18 of the '101 Patent to the exemplary CAST SBLABL1 Accused Product is attached hereto as Ex. 57.

3. Infringement of the '971 Patent

50. Upon information and belief, CAST directly infringes Asserted Claims 1, and 7-9 of the '971 Patent by having made, selling for importation, importing into the United States, and/or selling within the United States after importation the CAST Accused Products.

51. CAST has had actual knowledge of the '971 Patent since at least the filing of this Complaint.

52. Upon information and belief, CAST induces its customers to infringe Asserted Claims 1 and 7-9 of the '971 Patent with the specific intent to encourage their infringement by, among other things, marketing, creating, and/or distributing specifications, marketing materials, manuals, installation instructions, data sheets, application notes, and/or similar materials with instructions on using or rendering operable the CAST Accused Products. Upon information and belief, CAST's customers who purchase the CAST Accused Products and use or re-sell the CAST Accused Products infringe the Asserted Claims. Upon information and belief, CAST knew or should have known that the induced acts constitute direct infringement.

53. A chart that applies Asserted Claims 1 and 7-9 of the '971 Patent to the exemplary CAST SBLABL1 Accused Product is attached hereto as Ex. 58.

B. Wonka

54. The accused Wonka products are LED landscape lighting devices and components thereof, including the exemplary Brass Garden Light SD31A, SD31C (made for CAST), and other substantially similar LED landscape lighting devices that infringe certain claims of the Asserted Patents (“the Wonka Accused Products”). The SD31A is Wonka’s off-the-shelf infringing product and the SD31C is a substantially similar infringing product with minor customizations made for sale to CAST. Ex. 77. Upon information and belief, these infringing products are manufactured in China, sold for importation, imported into the United States, and then sold in the United States after importation.

55. Upon information and belief, Wonka has infringed and continues to infringe, directly and/or indirectly, at least the Asserted Claims of each of the Asserted Patents set forth below. Upon information and belief, Wonka infringes the Asserted Claims of the Asserted Patents literally and/or under the doctrine of equivalents by importing infringing products into the United States, selling infringing products outside the United States for importation into the United States, and/or selling infringing products after importation into the United States. For example, according to the supply agreement Wonka has with CAST, Wonka has contracted to manufacture certain Wonka Accused Products on behalf of CAST in China. Exs. 80, 81. Wonka has also supplied the Wonka Accused Products to cBright and the Dauer Respondents. Exs. 16, 45, 75C.

56. The following table summarizes the claims of the Asserted Patents asserted against Wonka:

Patent	Asserted Claims
'101	1-3, 6, 8-13, 18
'971	1, 7-9

Table 5. Claims asserted against Wonka

1. Importation

57. Exemplary instances of importation, sale, and offers for sale of Wonka Accused Products that infringe the Asserted Patents are set forth below.

58. Upon information and belief, Wonka manufactures the infringing Wonka Accused Products in China, sells for importation and/or imports these products into the United States, and sells them in the United States directly and/or through third parties. For example, Wonka has contracted with CAST to manufacture infringing LED landscape lighting products on behalf of CAST in China. Exs. 80, 81. Upon information and belief, Wonka has similar arrangements with other companies in the United States including cBright and the Dauer Respondents. Exs. 16, 45, 75C.

59. In addition, in the D.N.J. case, CAST admitted in its Answer to the Complaint and interrogatory responses that Wonka manufactures Wonka Accused Products in China, which CAST then imports from Wonka and then sells in the United States. *See* Exs. 76-78.

60. Finally, the Wonka Accused Products are labeled as manufactured in China and have been purchased in the United States, further demonstrating that the Wonka Accused Products are imported. *See* Ex. 71C.



2. Infringement of the '101 Patent

61. Upon information and belief, Wonka directly infringes Asserted Claims 1-3, 6, 8-13, and 18 of the '101 Patent by making, selling for importation, importing into the United States, and/or selling within the United States after importation the Wonka Accused Products.

62. Due to its business relationship with CAST, Wonka has had actual knowledge of the '101 Patent since at least April 2020, after WAC initiated the DNJ case against CAST.

63. Upon information and belief, Wonka contributes to the infringement of the Asserted Claims of the '101 Patent by selling for importation, importing into the United States, and/or selling within the United States after importation the infringing components of the Wonka Accused Products that embody a material part of the claimed inventions of the '101 Patent and that are specially made or adapted for use in assembled products, including LED landscape lighting devices and fixtures such as the SD31A and SD31C products and substantially similar LED landscape lighting devices. The components of the Wonka Accused Products are used only

to operate infringing LED landscape lighting devices and fixtures, resulting in direct infringement of the '101 Patent, and have no substantial non-infringing uses and are not staple articles of commerce. Upon information and belief, Wonka knows that its components are specially made or adapted for use in assembled LED landscape lighting devices and fixtures that are infringing.

64. Upon information and belief, Wonka induces wholesalers, resellers, and distributors of the Wonka Accused Products, including, for example, CAST, cBright, and the Dauer Respondents, to infringe the Asserted Claims of the '101 Patent with the specific intent to encourage their infringement by, among other things, marketing, selling, selling for importation, importing, and contracting to sell for importation the Wonka Accused Products. Upon information and belief, wholesalers, resellers, and distributors who purchase the Wonka Accused Products, import, make, and/or sell the Wonka Accused Products in the United States, thus infringe the Asserted Claims. Upon information and belief, wholesalers, resellers, and distributors who purchase the Wonka Accused Products from Wonka, and then import, make, and/or sell the Wonka Accused Products in the United States are thus infringing the Asserted Claims. Upon information and belief, Wonka knows or should have known that these induced acts constitute direct infringement. For example, Wonka has been aware of WAC's lawsuit in the District Court of New Jersey against Respondent CAST involving the Wonka Accused Products and infringement of the '101 Patent.

65. Charts that apply Asserted Claims 1-3, 6, 8-13 and 18 of the '101 Patent to the exemplary Wonka SD31A and SD31C Accused Products are attached hereto as Exs. 66 and 68.

3. Infringement of the '971 Patent

66. Upon information and belief, Wonka directly infringes Asserted Claims 1 and 7-9 of the '971 Patent by making, selling for importation, importing into the United States, and/or selling within the United States after importation the Wonka Accused Products.

67. Wonka has had actual knowledge of the '971 Patent since at least the filing of this Complaint.

68. Upon information and belief, Wonka contributes to the infringement of the Asserted Claims of the '971 Patent by manufacturing, selling for importation, importing into the United States, and/or selling within the United States after importation the components of the Wonka Accused Products that embody a material part of the claimed inventions of the '971 Patent and that are specially made or adapted for use in assembled products, including infringing LED landscape lighting devices and fixtures such as the SD31A and SD31C products and substantially similar LED landscape lighting devices. The components of the Wonka Accused Products are used only to operate infringing LED landscape lighting devices and fixtures, resulting in direct infringement of the '971 Patent, and have no substantial non-infringing uses and are not staple articles of commerce. Upon information and belief, Wonka knows that its components are specially made or adapted for use in assembled LED landscape lighting devices and fixtures that are infringing.

69. Upon information and belief, Wonka induces wholesalers, resellers, and distributors of the Wonka Accused Products, including, for example, CAST, cBright, and the Dauer Respondents, to infringe the Asserted Claims of the '971 Patent with the specific intent to encourage their infringement by, among other things, manufacturing, marketing, importing, selling, selling for importation, and contracting to sell for importation the Wonka Accused Products. Upon information and belief, wholesalers, resellers, and distributors who purchase the

Wonka Accused Products from Wonka, and import, make, and/or sell the Wonka Accused Products in the United States thus infringe the Asserted Claims. Upon information and belief, wholesalers, resellers, and distributors who purchase the components of the Wonka Accused Products from Wonka, and then import, make and/or sell the Wonka Accused Products in the United States thus infringe the Asserted Claims. Upon information and belief, Wonka knew or should have known that these induced acts constitute direct infringement.

70. Charts that apply Asserted Claims 1 and 7-9 of the '971 Patent to the exemplary Wonka SD31A and SD31C Accused Products are attached hereto as Exs. 67 and 69.

C. cBright

71. The accused cBright products are LED landscape lighting devices and components thereof, including the exemplary cBright Dyno Classic SD31A Landscaping Light, and other substantially similar infringing LED landscape lighting devices that infringe certain claims of the Asserted Patents (“the cBright Accused Products”). Upon information and belief, the cBright Accused Products are manufactured in China by cBright and/or a third party such as Wonka, sold for importation, imported into the United States, and/or then sold in the United States after importation.

72. Upon information and belief, cBright has infringed and continues to infringe, directly and/or indirectly, at least the Asserted Claims of each of the Asserted Patents as set forth below. Upon information and belief, cBright infringes the Asserted Claims of the Asserted Patents literally and/or under the doctrine of equivalents by making and/or having a third party manufacture infringing products, selling products that infringe for importation, importing those infringing products into the United States, and/or by selling those infringing products within the United States after importation.

73. The following table summarizes the claims asserted against cBright:

Patent	Asserted Claims
'101	1-3, 6, 8-13, 18
'971	1, 7-9

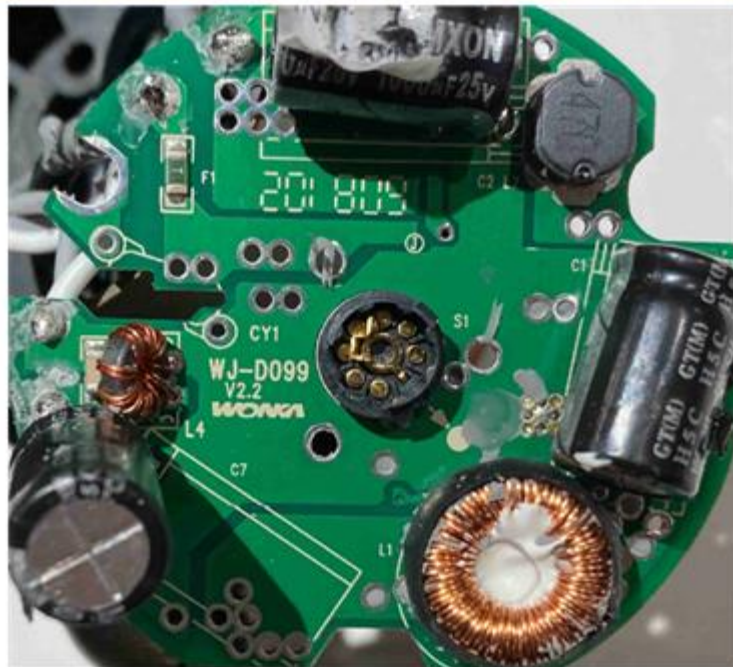
Table 6. Claims asserted against cBright

1. Importation

74. Exemplary instances of importation, sale, and offers for sale of the cBright Accused Products that infringe the Asserted Patents are set forth below.

75. Upon information and belief, cBright manufactures LED landscape lighting devices in China, imports these products, and sells them in the United States after importation directly and/or through third parties. Upon information and belief, it does so at least through its commercial relationship with Wonka with whom cBright has contracted to manufacture LED landscape lighting products on its behalf in China in a manner similar to Wonka’s commercial relationship with CAST. Exs. 16, 23, 24, 53, 81 (describing Wonka Lighting as a “Chinese Manufacturer”). Upon information and belief, the cBright Dyno Classic SD31A Landscaping Light is the “off the shelf” version of the Wonka SD31A garden light. *Compare* Exs. 23 and 53 (cBright SD31A) *with* Ex. 16 (Wonka SD31A); *see* Exs. 77-78 (Cast Interrogatory Responses explaining the SD31A as Wonka’s off the shelf product and that Wonka manufactures in China). *See also* Ex. 75C.

76. The cBright SD31A has been purchased in the United States and has Wonka markings on it further demonstrating that cBright’s Accused Products are imported from Wonka in China. *See* Ex. 75C.



2. Infringement of the '101 Patent

77. Upon information and belief, cBright directly infringes claims 1-3, 6, 8-13, and 18 of the '101 Patent by making, selling for importation, importing into the United States, and/or selling within the United States after importation the cBright Accused Products.

78. cBright has had actual knowledge of the '101 Patent since at least the filing of this Complaint.

79. Upon information and belief, cBright induces its customers to infringe Asserted Claims 1-3, 6, 8-13, and 18 of the '101 Patent with the specific intent to encourage their infringement by, among other things, marketing, creating, and/or distributing specifications, marketing materials, manuals, installation instructions, data sheets, application notes, and/or similar materials with instructions on using or rendering operable the cBright Accused Products. Upon information and belief, cBright's customers who purchase the cBright Accused Products and use or re-sell the cBright Accused Products, infringe the Asserted Claims. Upon information and belief, cBright knows or should have known that the induced acts constitute direct infringement.

80. A chart that applies Asserted Claims 1-3, 6, 8-13 and 18 of the '101 Patent to the exemplary cBright Dyno Classic SD31A Landscaping Light Accused Product is attached hereto as Ex. 61.

3. Infringement of the '971 Patent

81. Upon information and belief, cBright directly infringes Asserted Claims 1 and 7-9 of the '971 Patent by making, selling for importation, importing into the United States, and/or selling within the United States after importation the cBright Accused Products.

82. cBright has had actual knowledge of the '971 Patent since at least the filing of this Complaint.

83. Upon information and belief, cBright induces its customers to infringe Asserted Claims 1 and 7-9 of the '971 Patent with the specific intent to encourage their infringement by, among other things, marketing, creating, and/or distributing specifications, marketing materials, manuals, installation instructions, data sheets, application notes, and/or similar materials with instructions on using or rendering operable the cBright Accused Products. Upon information and belief, cBright's customers who purchase the cBright Accused Products and use or re-sell the

cBright Accused Products, infringe the Asserted Claims. Upon information and belief, cBright knows or should have known that the induced acts constitute direct infringement.

84. A chart that applies Asserted Claims 1 and 7-9 of the '971 Patent to the exemplary cBright Dyno Classic SD31A Landscaping Light Accused Product is attached hereto as Ex. 62.

D. The Dauer Respondents

85. The accused Dauer Respondents' products are LED landscape lighting devices and components thereof including for example, the Dauer 490098 Accu-Flood Integrated LED Uplight and other substantially similar infringing LED landscape lighting devices that infringe certain claims of the Asserted Patents ("the Dauer Accused Products"). Upon information and belief, these infringing LED landscape lighting devices and components thereof are manufactured in China by the Dauer Respondents and/or a third party such as Wonka, sold for importation, imported into the United States, and/or then sold in the United States after importation.

86. Upon information and belief, the Dauer Respondents have infringed and continue to infringe, directly and/or indirectly, at least the Asserted Claims of each of the Asserted Patents as set forth below. Upon information and belief, the Dauer Respondents infringe the Asserted Claims of the Asserted Patents literally and/or under the doctrine of equivalents by making and/or having a third party manufacture infringing products, selling products that infringe for importation, importing those infringing products into the United States, and/or by selling those infringing products within the United States after importation.

87. The following table summarizes the claims asserted against the Dauer Respondents:

Patent	Asserted Claims
'101	1-3, 6, 8-13, 18
'971	1, 7-9

Table 7. Claims asserted against the Dauer Respondents

1. Importation

88. Exemplary instances of importation, sale, and offers for sale of the Dauer Accused Products that infringe the Asserted Patents are set forth below.

89. Upon information and belief, the Dauer Respondents manufacture LED landscape lighting devices and/or components thereof in China, sell these products for importation, import these products, and/or sell them after importation in the United States directly and/or through third parties. Upon information and belief, they do so at least through their commercial relationship with Wonka with whom the Dauer Respondents have contracted to manufacture LED landscape lighting products on their behalf in China in a similar manner to CAST. Exs. 16, 27, 45, 81 (describing Wonka Lighting as a “Chinese Manufacturer”). For example, upon information and belief, the Dauer 490098 Accu-Flood Integrated LED Uplight is the “off the shelf” version of the Wonka SD31A garden light. *Compare* Exs. 45, 47 (Dauer 490098) *with* Ex. 16 (Wonka SD31A); *see also* Exs. 77-78 (Cast Interrogatory Responses explaining the SD31A as Wonka’s off the shelf product and that Wonka manufactures in China). Additionally, FUSA, the corporate parent or affiliate of Dauer Manufacturing, advertises the sale of the Dauer Accused Products through its website. *See* Ex. 30.

90. Correspondence from a U.S. distributor for the Dauer Respondents further confirms that the Dauer Accused Products and/or their components are imported from China for sale in the United States. *See* Ex. 79C; *see also* Ex. 72C.

2. Infringement of the '101 Patent

91. Upon information and belief, Dauer Manufacturing directly infringes claims 1-3, 6, 8-13, and 18 of the '101 Patent by making, selling for importation, importing into the United States, and/or selling within the United States after importation the Dauer Accused Products.

92. Dauer Manufacturing has had actual knowledge of the '101 Patent since at least the filing of this Complaint.

93. Upon information and belief, Dauer Manufacturing induces its customers to infringe Asserted Claims 1-3, 6, 8-13, and 18 of the '101 Patent with the specific intent to encourage their infringement by, among other things, marketing, creating, and/or distributing specifications, marketing materials, manuals, installation instructions, data sheets, application notes, and/or similar materials with instructions on using or rendering operable the Dauer Accused Products. Upon information and belief, Dauer Manufacturing's customers who purchase the Dauer Accused Products and use or re-sell the Dauer Accused Products infringe the Asserted Claims. Upon information and belief, Dauer Manufacturing knows or should have known that the induced acts constitute direct infringement.

94. Upon information and belief, FUSA directly infringes claims 1-3, 6, 8-13, and 18 of the '101 Patent by making, selling for importation, importing into the United States, and/or selling within the United States after importation the Dauer Accused Products.

95. FUSA has had actual knowledge of the '101 Patent since at least the filing of this Complaint.

96. Upon information and belief, FUSA induces its customers to infringe Asserted Claims 1-3, 6, 8-13, and 18 of the '101 Patent with the specific intent to encourage their infringement by, among other things, marketing, creating, and/or distributing specifications, marketing materials, manuals, installation instructions, data sheets, application notes, and/or

similar materials with instructions on using or rendering operable the Dauer Accused Products. Upon information and belief, FUSA's customers who purchase the Dauer Accused Products and use or re-sell the Dauer Accused Products infringe the Asserted Claims. Upon information and belief, FUSA knows or should have known that the induced acts constitute direct infringement.

97. A chart that applies Asserted Claims 1-3, 6, 8-13 and 18 of the '101 Patent to the exemplary Dauer 490098 Accused Product is attached hereto as Ex. 59.

3. Infringement of the '971 Patent

98. Upon information and belief, Dauer Manufacturing directly infringes Asserted Claims 1 and 7-9 of the '971 Patent by making, selling for importation, importing into the United States, and/or selling within the United States after importation the Dauer Accused Products.

99. Dauer Manufacturing has had actual knowledge of the '971 Patent since at least the filing of this Complaint.

100. Upon information and belief, Dauer Manufacturing induces its customers to infringe Asserted Claims 1 and 7-9 of the '971 Patent with the specific intent to encourage their infringement by, among other things, marketing, creating, and/or distributing specifications, marketing materials, manuals, installation instructions, data sheets, application notes, and/or similar materials with instructions on using or rendering operable the Dauer Accused Products. Upon information and belief, Dauer Manufacturing's customers who purchase the Dauer Accused Products and use or re-sell the Dauer Accused Products infringe the Asserted Claims. Upon information and belief, Dauer Manufacturing knows or should have known that the induced acts constitute direct infringement.

101. Upon information and belief, FUSA directly infringes Asserted Claims 1 and 7-9 of the '971 Patent by making, selling for importation, importing into the United States, and/or selling within the United States after importation the Dauer Accused Products.

102. FUSA has had actual knowledge of the '971 Patent since at least the filing of this Complaint.

103. Upon information and belief, FUSA induces its customers to infringe Asserted Claims 1 and 7-9 of the '971 Patent with the specific intent to encourage their infringement by, among other things, marketing, creating, and/or distributing specifications, marketing materials, manuals, installation instructions, data sheets, application notes, and/or similar materials with instructions on using or rendering operable the Dauer Accused Products. Upon information and belief, FUSA's customers who purchase the Dauer Accused Products and use or re-sell the Dauer Accused Products infringe the Asserted Claims. Upon information and belief, FUSA knows or should have known that the induced acts constitute direct infringement.

104. A chart that applies Asserted Claims 1 and 7-9 of the '971 Patent to the exemplary Dauer 490098 Accused Product is attached hereto as Ex. 60.

E. The Lumien Respondents

105. The accused Lumien Respondents' products are LED landscape lighting devices and components thereof including for example, the D5A1-aW Spot Light, the Lumien LGLSP0807IP D6B1-aW Spot Light, and other substantially similar infringing LED landscape lighting devices that infringe certain claims of the Asserted Patents ("the Lumien Accused Products"). Upon information and belief, these infringing LED landscape lighting devices and components thereof are manufactured in China, sold for importation, imported into the United States, and/or then sold in the United States after importation.

106. Upon information and belief, the Lumien Respondents have infringed and continue to infringe, directly and/or indirectly, at least the Asserted Claims of each of the Asserted Patents as set forth below. Upon information and belief, the Lumien Respondents infringe the Asserted Claims of the Asserted Patents literally and/or under the doctrine of

equivalents by making and selling products that infringe, importing those products into the United States, and/or by selling those products within the United States after importation.

107. The following table summarizes the claims asserted against the Lumien Respondents:

Patent	Asserted Claims
'101	1-6, 8-13, 18
'971	1, 7-9

Table 8. Claims asserted against the Lumien Respondents

1. Importation

108. Exemplary instances of importation, sale, and offers for sale of the Lumien Accused Products that infringe the Asserted Patents are set forth below.

109. Upon information and belief, JSL manufactures the Lumien Accused Products in China and offers them for sale for importation, and JSL and/or Lumien Lighting import these products and sell them in the United States directly and/or through third parties. Lumien Lighting asserts that “[t]he manufacturing plant for Lumien Lighting sits on 5 acres in China.” *See* Ex. 39. On information and belief, the manufacturing plant in China belongs to JSL which is located in China. *Id.*

110. The Lumien Accused Products that are advertised on Lumien Lighting’s website as manufactured in China, Ex. 39, have been purchased in the United States, further demonstrating that the Lumien Accused Products are imported. *See* Exs. 73C-74C.

2. Infringement of the '101 Patent

111. Upon information and belief, Lumien Lighting directly infringes Asserted Claims 1-6, 8-13, and 18 of the '101 Patent by making, selling for importation, importing into the United States, and/or selling within the United States after importation the Lumien Accused Products.

112. Lumien Lighting has had actual knowledge of the '101 Patent since at least the filing of this Complaint.

113. Upon information and belief, Lumien Lighting induces its customers to infringe Asserted Claims 1-6, 8-13, and 18 of the '101 Patent with the specific intent to encourage their infringement by, among other things, marketing, creating, and/or distributing specifications, marketing materials, manuals, installation instructions, data sheets, application notes, and/or similar materials with instructions on using or rendering operable the Lumien Accused Products. Upon information and belief, Lumien Lighting's customers who purchase the Lumien Accused Products and use or re-sell the Lumien Accused Products infringe the Asserted Claims. Upon information and belief, Lumien Lighting knows or should have known that the induced acts constitute direct infringement.

114. Upon information and belief, JSL directly infringes Asserted Claims 1-6, 8-13, and 18 of the '101 Patent by making, selling for importation, importing into the United States, and/or selling within the United States after importation the Lumien Accused Products.

115. JSL has had actual knowledge of the '101 Patent since at least the filing of this Complaint.

116. Upon information and belief, JSL induces wholesalers, resellers, and distributors of the Lumien Accused Products, including, for example, its subsidiary Lumien Lighting, to infringe the Asserted Claims of the '101 Patent with the specific intent to encourage their infringement by, among other things, marketing, selling, selling for importation, and contracting to sell for importation the Lumien Accused Products. Upon information and belief, wholesalers, resellers, and distributors who purchase the Lumien Accused Products, import, make, and/or sell the Lumien Accused Products in the United States, thus infringe the Asserted Claims. Upon

information and belief, wholesalers, resellers, and distributors who purchase the Lumien Accused Products from JSL, and then import, make, and/or sell the Lumien Accused Products in the United States are thus infringing the Asserted Claims. Upon information and belief, JSL knows or should have known that these induced acts constitute direct infringement.

117. A chart that applies Asserted Claims 1-4, 6, 8, 11-13 and 18 of the '101 Patent to the exemplary Lumien D5A1-aW Spot Light Accused Product is attached hereto as Ex. 63. A chart that applies Asserted Claims 1-6, 8-13 and 18 of the '101 Patent to the exemplary Lumien LGLSP0807IP D6B1-aW Spot Light Accused Product is attached hereto as Ex. 65.

3. Infringement of the '971 Patent

118. Upon information and belief, Lumien Lighting directly infringes Asserted Claims 1 and 7-9 of the '971 Patent by making, selling for importation, importing into the United States, and/or selling within the United States after importation the Lumien Accused Products.

119. Lumien Lighting has had actual knowledge of the '971 Patent since at least the filing of this Complaint.

120. Upon information and belief, Lumien Lighting induces its customers to infringe Asserted Claims 1 and 7-9 of the '971 Patent with the specific intent to encourage their infringement by, among other things, marketing, creating, and/or distributing specifications, marketing materials, manuals, installation instructions, data sheets, application notes, and/or similar materials with instructions on using or rendering operable the Lumien Accused Products. Upon information and belief, Lumien Lighting's customers who purchase the Lumien Accused Products and use or re-sell the Lumien Accused Products infringe the Asserted Claims. Upon information and belief, Lumien Lighting knows or should have known that the induced acts constitute direct infringement.

121. Upon information and belief, JSL directly infringes Asserted Claims 1 and 7-9 of the '971 Patent by making, selling for importation, importing into the United States, and/or selling within the United States after importation the Lumien Accused Products.

122. JSL has had actual knowledge of the '971 Patent since at least the filing of this Complaint.

123. Upon information and belief, JSL induces wholesalers, resellers, and distributors of the Lumien Accused Products, including, for example, its subsidiary Lumien Lighting, to infringe the Asserted Claims of the '971 Patent with the specific intent to encourage their infringement by, among other things, marketing, selling, selling for importation, and contracting to sell for importation the Lumien Accused Products. Upon information and belief, wholesalers, resellers, and distributors who purchase the Lumien Accused Products, import, make, and/or sell the Lumien Accused Products in the United States, thus infringe the Asserted Claims. Upon information and belief, wholesalers, resellers, and distributors who purchase the Lumien Accused Products from JSL, and then import, make, and/or sell the Lumien Accused Products in the United States are thus infringing the Asserted Claims. Upon information and belief, JSL knew or should have known that these induced acts constitute direct infringement.

124. A chart that applies Asserted Claims 1 and 7-9 of the '971 Patent to the exemplary Lumien D5A1-aW Spot Light Accused Product is attached hereto as Ex. 64.

VI. Related Litigation

125. The '101 Patent is and has been the subject of district court litigation and U.S. Patent Office Proceedings. The parent and grandparent patents of the '101 Patent were also the subject of district court litigation. There are no other related litigations.

A. United States District Courts

126. *Wangs Alliance Corporation d/b/a WAC Lighting v. CAST Lighting LLC*, No. 2:20-cv-03710-MCA-MAH (D.N.J.) involves the '101 Patent and the alleged unfair acts by Respondent CAST. It is currently pending in the United States District Court for the District of New Jersey ("D.N.J. Case"). On April 20, 2020, WAC filed a complaint in the D.N.J. against CAST alleging infringement of the '101 Patent. The parties have exchanged discovery, including documents and interrogatory responses. One witness has been deposed. Infringement and invalidity contentions have been exchanged as part of mandatory disclosures under the court's local patent rules. Claim construction briefing has been completed, but a *Markman* hearing has not yet been held, and no claim construction order has been issued.

127. *Wangs Alliance Corporation d/b/a WAC Lighting v. Lumien Enterprise, Inc. d/b/a Lumien Lighting*, No. 1:19-cv-4653-MHC (N.D. Ga.), did not involve any of the Asserted Patents in this Investigation, but involved the parent and grandparent patents of the '101 Patent, U.S. Patent Nos. 10,323,832 and 10,465,888, and Respondent Lumien Enterprise, Inc. d/b/a Lumien Lighting. The case did not progress beyond the exchange of pleadings. The parties settled prior to exchanging discovery.

B. United States Patent and Trademark Office

128. Of the Asserted Patents, only the '101 Patent has been the subject of a Patent Office Proceeding. On November 24, 2020, Respondent CAST filed a post-grant-review ("PGR") petition with the Patent Trial and Appeal Board ("PTAB") of the United States Patent and Trademark Office, PGR2021-0012, challenging the validity of claims 1-20 of the '101 Patent. The PTAB has not yet determined whether to institute CAST's PGR; the PTAB's decision on this issue is expected on June 10, 2021. WAC's response to CAST's PGR petition is due on March 10, 2021.

VII. Classification of the Accused Products Under the Harmonized Tariff Schedule of the United States

129. On information and belief, the Harmonized Tariff Schedule (“HTS”) of the United States item number under which the infringing LED lighting devices may be imported into the United States and classified under includes at least the following heading and subheading of HTS 9405.10.80 or 9405.40.20 of the United States.

130. This classification is exemplary in nature and not intended to restrict the scope of this Investigation or any exclusion order or other remedy ordered by the Commission.

VIII. The Domestic Industry

A. Economic Prong

131. WAC has a domestic industry (“DI”) under at least 19 U.S.C. § 1337(a)(3)(A), (B), and/or (C). WAC has engaged in extensive design, research, development, testing, and engineering in the United States related to LED landscape lighting devices and fixtures practicing at least one claim of each of the Asserted Patents (“the DI Products” as identified in the accompanying confidential exhibit), as well as related products. Ex. 87C. In addition, WAC engages in assembly of certain DI Products, product development, and technical customer support and service, in the United States related to the DI Products. These DI Products are the subject of ongoing domestic investments by WAC.

132. The DI Products are designed, developed, tested, assembled, marketed, sold, and supported by WAC in the United States. Sales of the DI Products comprise a significant portion of WAC’s landscape business, based on sales revenue.

133. WAC engages in substantial activities related to the research, design, development, testing, assembly, product support, and sales of DI Products in the United States, including at facilities located in Port Washington, New York, Lithia Springs, Georgia, Ontario,

California, and Dallas, Texas. WAC has made significant investments in plants and equipment at these locations related to the DI Products and the technology of the Asserted Patents. Ex. 87C at ¶¶ 9-15, 25-29.

134. WAC makes significant investments in labor and capital with respect to the DI Products and the technology of the Asserted Patents in the United States. WAC employs engineers performing design, research and development, and ongoing product support. In addition, WAC domestically employs personnel engaged in assembly of the DI Products, customer support, marketing, and sales. Ex. 87C at ¶¶ 16-29.

135. WAC has engaged in and continues to engage in substantial research and development and engineering in the United States with respect to the DI Products and the technology of the Asserted Patents. Ex. 87C at ¶¶ 9-11, 15-19, 25-29.

136. Additional confidential business information regarding WAC's investments in plant, equipment, labor, capital, research and development, and engineering related to the DI Products and the technology of the Asserted Patents is set forth in confidential Exhibit 87C. WAC's significant domestic investments in the DI Products and the technology of the Asserted Patents is continuing and ongoing.

B. Technical Prong

1. The '101 Patent

137. The following WAC DI Products practice at least one or more of claims 1-8, 10-12, and 14-20 of the '101 Patent: Model 5011 Accent products, which includes the 5011-27BZ, 5011-27BK, 5011-27BBR, 5011-30BZ, 5011-30BK, and 5011-30BBR products; Model 5012 Accent products, which includes the 5012-30BK, 5012-30BZ, and 5012-30BBR products; Model 5211 Grand Accent products, which includes the 5211-27BZ, 5211-27BK, 5211-27BBR, 5211-30BZ, 5211-30BK, 5211-30BBR, 5211-40BZ, 5211-40BK, and 5211-40BBR products; Model

5212 Grand Accent products, which includes the 5212-30BZ, 5212-30BK, 5212-30BBR, 5212-40BZ, 5212-40BK, and 5212-40BBR products; Model 5111 Mini Accent products, which includes the 5111-27BZ, 5111-27BK, 5111-27BBR, 5111-30BZ, 5111-30BK, and 5111-30BBR products; Model 5021 Wall Wash products, which includes the 5021-27BZ, 5021-27BK, 5021-27BBR, 5021-30BZ, 5021-30BK, and 5021-30BBR products; Model 5022 Wall Wash products, which includes the 5022-30BZ, 5022-30BK, and 5022-30BBR products; Model 5221 Adjustable Beam Wall Wash products, which includes the 5221-27BZ, 5221-27BK, 5221-27BBR, 5221-30BZ, 5221-30BK, and 5221-30BBR products; Model 5222 Adjustable Beam Wall Wash products, which includes the 5222-27BZ, 5222-27BK, 5222-27BBR, 5222-30BZ, 5222-30BK, and 5222-30BBR products; Model 6111 Mini Accent Path products, which includes the 6111-27BZ, 6111-27BBR, 6111-30BZ, and 6111-30BBR products; and Model 6211 Mini Accent Path products, which includes the 6211-27BZ, 6211-27BBR, 6211-30BZ, and 6211-30BBR products.

138. A claim chart is set forth in Ex. 83 comparing claim 1 of the '101 Patent to an exemplary DI Product (Model 6111 Mini Accent Path product).

2. The '971 Patent

139. The following WAC DI Products practice at least one or more of claims 1-14 of the '971 Patent: Model 5111 Mini Accent products, which includes the 5111-27BZ, 5111-27BK, 5111-27BBR, 5111-30BZ, 5111-30BK, and 5111-30BBR products; Model 5121 Mini Wall Wash products, which includes the 5121-27/30BZ, 5121-27/30BBR, and 5121-27/30BK products; Model 5031 Inground products, which includes the 5031-30BZ, 5031-30BBR, 5031-27BZ, and 5031-27BBR products; Model 5032 Inground products, which includes the 5032-30BZ and 5032-30BBR products; Model 6111 Mini Accent Path products, which includes the 6111-27BZ, 6111-27BBR, 6111-30BZ, and 6111-30BBR products; and Model 6211 Mini

Accent Path products, which includes the 6211-27BZ, 6211-27BBR, 6211-30BZ, and 6211-30BBR products.

140. A claim chart is set forth in Ex. 84 comparing claim 1 of the '971 Patent to an exemplary DI Product (Model 6111 Mini Accent Path product).

IX. Requested Relief

141. WHEREFORE, by reason of the foregoing, WAC respectfully requests that the United States International Trade Commission:

(a) Institute an immediate investigation, pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337(a)(1)(B)(i) and (b)(1), with respect to violations of Section 337 based upon the importation into the United States of LED landscape lighting devices and components thereof that infringe one or more of the Asserted Claims of the Asserted Patents;

(b) Schedule and conduct a hearing on said unlawful acts for the purpose of (i) receiving evidence and hearing argument concerning whether there has been a violation of Section 337, and (ii) determining that there has been a violation of Section 337; and following said hearing;

(c) Issue a permanent limited exclusion order pursuant to 19 U.S.C. § 1337(d)(1) directed to products that are manufactured, imported, sold for importation, or sold after importation in the United States by or on behalf of Respondents and their subsidiaries, related companies, and agents, excluding from entry into the United States certain LED landscape lighting devices and components thereof that infringe (directly and/or indirectly), induce infringement of and/or contribute to infringement of one or more Asserted Claims of the Asserted Patents;

(d) Issue a permanent cease and desist order or orders, pursuant to 19 U.S.C. § 1337(f), directing Respondents and their subsidiaries, related companies, distributors, and agents from engaging in unfair acts including, but not limited to, importing, marketing, advertising, demonstrating, warehousing inventory for distribution, offering for sale, selling, distributing,

displaying, licensing, using, providing technical support for and/or otherwise transferring within the United States certain LED landscape lighting devices, components thereof and products including the same that infringe, induce infringement of and/or contribute to infringement of one or more claims of the Asserted Patents, and engaging in any other commercial activity related to such products in the United States;

(e) Set and impose a bond on importation and sales of infringing products sufficient to protect WAC during the 60-day period of Presidential review of the Commission's remedial orders; and

(f) Grant such other and further relief as the Commission deems just and proper based on the facts determined by the investigation and the authority of the Commission.

Dated: March 8, 2021

Respectfully Submitted,

By:



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**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON D.C.**

In the Matter of

**CERTAIN LED LANDSCAPE LIGHTING
DEVICES AND COMPONENTS THEREOF**

Investigation No. 337-TA-_____

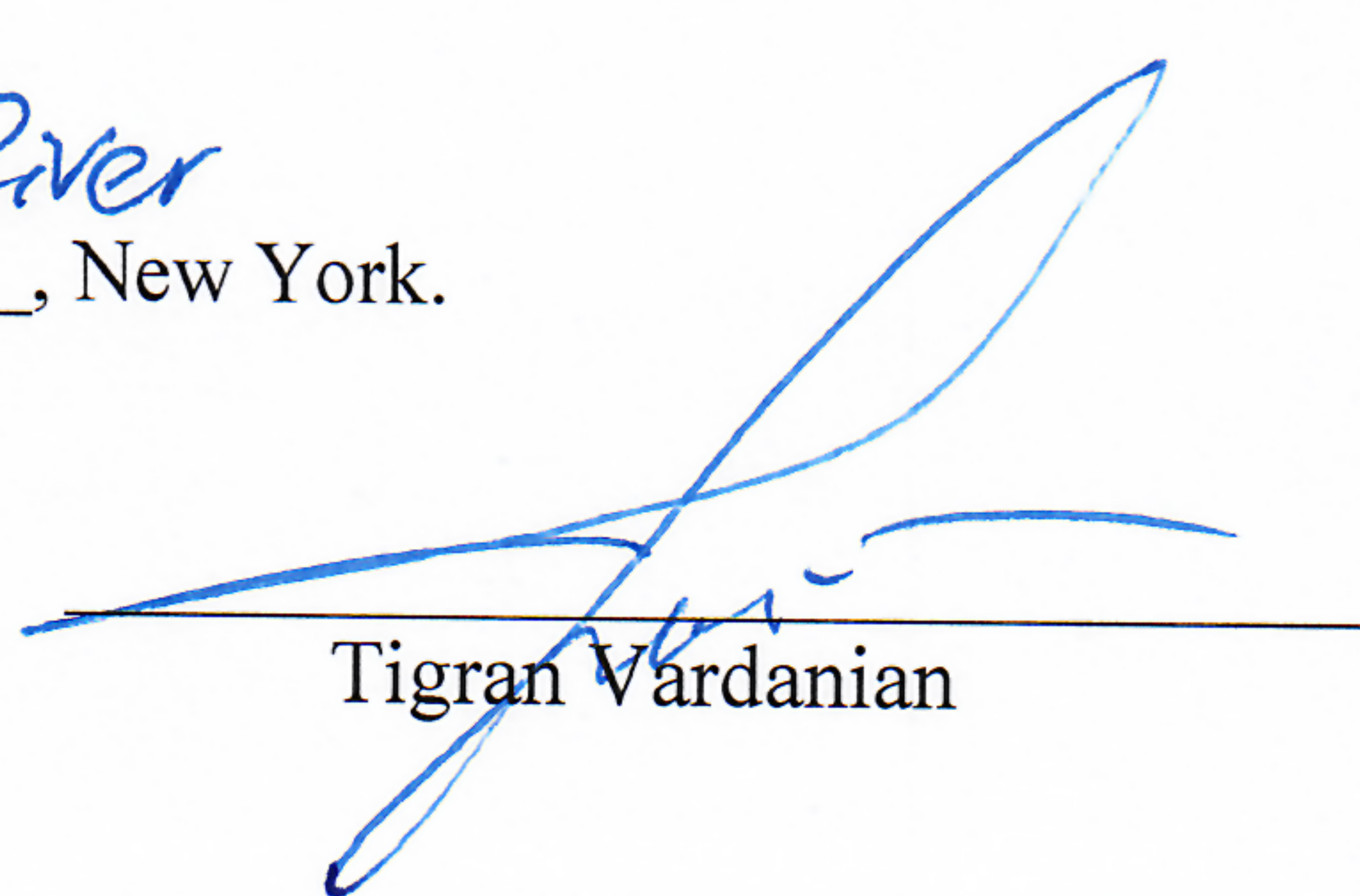
VERIFICATION TO COMPLAINT

I, Tigran Vardanian, declare in accordance with 19 C.F.R. §§ 210.4 and 210.12 as follows:

1. I am the General Counsel of Complainant Wangs Alliance Corporation d/b/a WAC Lighting ("WAC") and am duly authorized to submit this verification;
2. I have read the Complaint and am familiar with its contents;
3. To the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:
 - a. The allegations and other factual contentions in the Complaint are grounded in fact, have evidentiary support, or are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery;
 - b. The claims, defenses, and other legal contentions in the Complaint are warranted by existing law or by good faith, non-frivolous argument for the extension, modification, or reversal of existing law or the establishment of new law; and
 - c. The Complaint is not being presented for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation.

I declare under the penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed on March 6, 2021 in Wading River, New York.



Tigran Vardanian