

Joint stipulation approved 1/8/13.

s/ James S. Gwin

JAMES S. GWIN

UNITED STATES

DISTRICT JUDGE

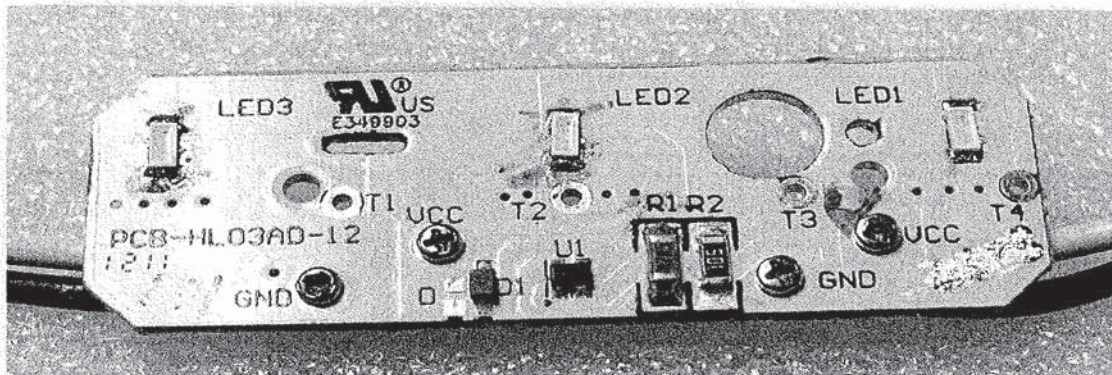
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

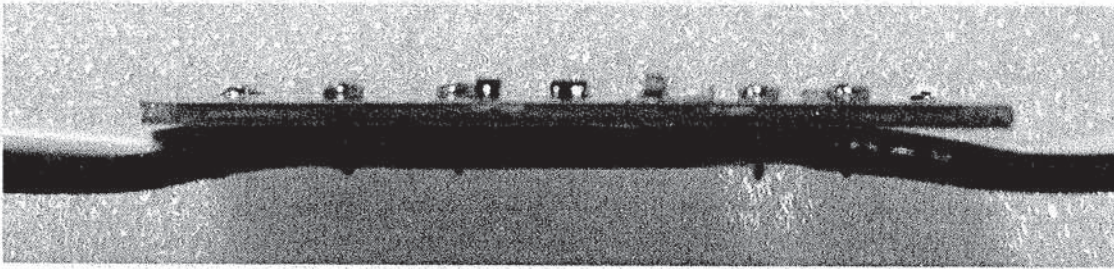
GE LIGHTING SOLUTIONS, LLC,)	CASE NO. 1:12-cv-00354-JG
)	
Plaintiff,)	
)	
v.)	JUDGE JAMES S. GWIN
)	MAGISTRATE JUDGE McHARGH
AGILIGHT, INC.,)	
)	
Defendant.)	JURY TRIAL DEMANDED

**JOINT STIPULATION CONCERNING CLAIMS
UNDER U.S. PATENTS 7,160,140 AND 7,520,771**

In light of the Court’s order concerning the construction of the terms “IDC Connector” and “Insulation Displacement Connector,” the parties hereby stipulate as follows:

1. Plaintiff has asserted claims against Defendant for infringement of claims 1-3, 5, 6, 10 and 14 of U.S. Patent No. 7,160,140 (the ‘140 Patent) and claims 1, 3, 6-8, 10, 12 and 15 of U.S. Patent No. 7,520,771 (the ‘771 Patent).
2. The Accused Products are AgiLight’s SignRayz® Apex G1, Apex G2, Core G1, Core G2, Base G1, Base G2, Color G1, Color G2, and Mini series products. A representative example of an accused product is depicted in pertinent part below:





3. The accused products are string light engines that each include:
 - a. a flexible insulated electrical conductor;
 - b. a plurality of circuit boards, each comprising a dielectric layer, circuitry, and at least one LED mounted on the circuit board and in electrical communication with the circuitry on the board on which it is mounted;
 - c. a plurality of conductive screws, each of which:
 - i. extends through and away from a printed circuit board;
 - ii. is in electrical communication with circuitry on the circuit board from which it extends; and
 - iii. includes a portion that is screwed through the insulation to contact the electrical conductor to provide an electrical connection between the conductor and the circuitry on the circuit board from which it extends; and
 - d. a plurality of overmolded housings (not shown in the above photos), each at least substantially surrounding a circuit board and a portion of the conductor adjacent such each circuit board.
4. As reflected in its Opinion And Order of December 13, 2012, the Court construed the phrase "IDC Connector" in claim 1 of the '140 Patent and claim 1 of the '771 Patent as follows:

Accordingly, the Court finds that the term "insulation displacement connector" or "IDC connector" as used in these patents means the Insulation Displacement Connector assembly with three key components. First, the connector consists of a housing of two parts. Second at least one part of the housing includes four electrical terminals. Third, the two parts can snap together to enclose three insulated conductors such as wires. The snapping together of the two component parts allows the terminal to cut or pierce through the insulation of that conductor, while at the same time forestalling the conductor from moving out of or detaching from the assembly. Once this connection is made between the terminal of the IDC connector and the insulated conductor, the two may be conductive.

5. The Parties stipulate that, as construed by the Court, the term "IDC Connector" in the identified claims cannot apply to the conductive screws of the accused devices. As a result, under the Court's construction the identified claims of the '140 Patent and the '771 Patent do not read on AgiLight's products.
6. Based on the above and the Court's adopted construction of "IDC Connector," the parties request entry of a partial summary judgment as to the claims for alleged infringement of these two patents.
7. By entering into this stipulation, GE Lighting Solutions, LLC does not concede the propriety of the Court's construction of the phrase "IDC Connector." GE Lighting Solutions, LLC is entering into this stipulation to avoid the costs, expenses and burdens that would be associated with full summary judgment briefing on this issue and to facilitate prompt and efficient appellate review of the Court's construction of "IDC Connector."
8. The present action presents more than one claim for relief. The summary judgment referenced above is directed only to those claims of infringement under the '140 and '771 Patents. To facilitate a prompt appeal of the Court's construction of "IDC Connector" GE anticipates that it will file a motion requesting the Court to expressly find that there is no just reason for delay and enter a final judgment only on the claims of alleged

infringement under the '140 and '771 Patent, pursuant to Fed. R. Civ. P. 54(b) to allow for a prompt appeal of that judgment.

Respectfully Submitted,

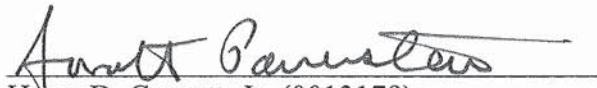


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