

Before the Patent Trial and Appeal Board

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COLEMAN CABLE, LLC, JIAWEI TECHNOLOGY (HK) LTD., JIAWEI TECHNOLOGY (USA) LTD., SHENZHEN JIAWEI PHOTOVOLTAIC LIGHTING CO, LTD., ATICO INTERNATIONAL (ASIA) LTD., ATICO INTERNATIONAL USA, INC., SMART SOLUTIONS INC., AND TEST RITE PRODUCTS CORP., (and the following additional parties: 936 and 938) CHIEN LUEN INDUSTRIES CO., LTD., INC. (CHIEN LUEN FLORIDA), CHIEN LUEN INDUSTRIES CO., LTD., INC. (CHIEN LUEN CHINA), NATURE'S MARK, AND RITE AID CORP. – Petitioner

v.

SIMON NICHOLAS RICHMOND – Patent Owner

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IPR Case No.: IPR2014-00935 (U.S. Patent No. 8,089,377)

IPR Case No.: IPR2014-00936 (U.S. Patent No. 7,196,477)

IPR Case No.: IPR2014-00938 (U.S. Patent No. 7,429,827)

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**Patent Owner's Replacement Demonstrative Exhibit S  
for Oral Argument**

**Dr. Shackle Testified that a Multi-Colored Light is Not Viewed as a Flame**



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- 10 10 Q. Dr. Shackle, I have a lighting element that has  
11 11 a multicolored feature.  
12 12 A. Isn't that beautiful.  
13 13 Q. That look like a flame to you?  
14 14 A. No, it doesn't.



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- 10 10 Q. Let me hand you -- where's the toy here?  
11 11 So this is another candle -- I hope I can  
12 12 actually make work -- let me turn it so you can see. So  
13 13 looking at that candle, right now it's got kind of a  
14 14 green flickering light, does that -- would you view that  
15 15 as a flame?  
16 16 A. Yes, I would.  
17 17 Q. What about if I change it to a red light?  
18 18 A. Still a flame.  
19 19 Q. What about if I change to multicolored lights?  
20 20 A. That's pushing it, but every other single color  
21 21 reminds me of a flame.  
22 22 Q. Okay. Oops, I can't turn it off here.