Filed on behalf of Valencell, Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC., Petitioner,

v.

VALENCELL, INC., Patent Owner.

Case IPR2017-00319 U.S. Patent No. 8,923,941

PATENT OWNER'S RESPONSE

Mail Stop PATENT BOARD Patent Trial and Appeal Board U.S. Patent & Trademark Office P.O. Box 1450 Alexandria, Virginia 22313-1450



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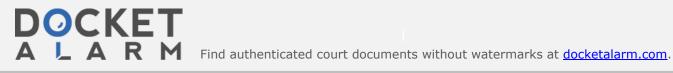
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		2.	Craw is directed to a specific data formatting scheme to address	SS	
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		from	signals obtained by a PPG sensor1	4	
	C. Neith		ner Luo nor Craw discloses elements [1.4] and [1.5], and a POSA	١	
		would not have been motivated to combine Luo and Craw to render			
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		1.	Luo does not disclose the processing of signals into a serial date	ta	
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			information	1	
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		3.	Luo and Craw cannot be combined to render "processing				
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		fron	from the at least one motion sensor and signals from the at least one				
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VI.	The dependent claims fail because Petitioner has not met its burden of	
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VII.	Patent Owner does not consent to the PTAB adjudicating the patentability of	or
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PATENT OWNER'S EXHIBIT LIST

Exhibit No.	Description
2001	S. LeBoeuf, et al., Earbud-Based Sensor for the Assessment of
	Energy Expenditure, HR, and VO2max, OFFICIAL J. AM. C.
	SPORTS M., 2014, 1046–1052
2002	Biometrics Lab: Performance of Leading Optical Heart Rate
	Monitors During Interval Exercise Conditions
2003	Valencell website (http://valencell.com/customers/)
2004	CTA - It Is Innovation (i3) Magazine 2016 Innovation-
	Entrepreneur Awards
2005	Declaration of T. William Kennedy - PHV Motion
2006	Declaration of Luca Pollonini
2007	Deposition of Majid Sarrafzadeh



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