#### UNITED STATES PATENT AND TRADEMARK OFFICE

### BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC., Petitioner,

v.

OMNI MEDSCI, INC., Patent Owner.

U.S. Patent No. 9,651,533

IPR Case No.: IPR2019-00913

#### PATENT OWNER'S PRELIMINARY RESPONSE TO PETITION FOR *INTER PARTES* REVIEW UNDER 37 C.F.R. § 42.107

DOCKET

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		a. The combination of LeBoeuf/Valencell-093 and			
		LeBoeuf/Valencell-099 does not teach a " <i>light</i>			
		source configured to increase signal-to-noise ratio			
		by <u>increasing a light intensity</u> from at least one of			
		the plurality of semiconductor sources"			
		b. The combination of LeBoeuf/Valencell-093 and			
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	2.	The combination of LeBoeuf/Valencell-093,			
		LeBoeuf/Valencell-099, and Carlson does not teach the			
		<i>"increasing a pulse rate"</i> portion of the Increasing			
C	C	Limitation			
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