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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.

Petitioner,

v.

MASIMO CORPORATION,

Patent Owner.

Case IPR2020-01526 U.S. Patent 6,771,994

DECLARATION OF VIJAY K. MADISETTI, PH.D.

DOCKET

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		1. Apple's combination would undermine Diab's invention
		 Apple's unexplained modification would cause Diab to perform worse
		3. The proposed modifications would not have yielded predictable results
		4. Apple fails to provide a credible motivation to add louvers
	В.	GROUND 2: THE COMBINATION OF WEBSTER AND MELBY DOES NOT TEACH THE CLAIMED INVENTION
		1. Apple conflates Webster's wavelength filter and Webster's light impervious barriers
		2. Melby does not disclose a plurality of louvers positioned over a light sensitive detector
		3. A POSITA would not have been motivated to modify Webster to include Melby's light control film over the photodiode

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IPR2020-01526 Apple Inc. v. Masimo Corporation

I, Vijay K Madisetti, Ph.D, declare as follows:

1. I have been retained by counsel for Patent Owner Masimo Corporation ("Masimo") as an independent expert witness in this proceeding. I have been asked to provide my opinions regarding the Petition in this action and the declaration offered by Brian W. Anthony, Ph.D., (EX1003) challenging the patentability of Claim 15 of U.S. Patent No. 6,771,994 ("the '994 Patent"). I am being compensated at my usual and customary rate for the time I spend working on this proceeding, and my compensation is not affected by its outcome.

I. **QUALIFICATIONS**

2. My qualifications are set forth in my curriculum vitae, a copy of which is included as Exhibit 2002. A summary of my qualifications follows.

3. I am a professor in Electrical and Computer Engineering at the Georgia Institute of Technology ("Georgia Tech"). I have worked in the area of digital signal processing, wireless communications, computer engineering, integrated circuit design, and software engineering for over 25 years, and have authored, co-authored, or edited several books and numerous peer-reviewed technical papers in these area.

4. I obtained my Ph.D. in Electrical Engineering and Computer Science at the University of California, Berkeley, in 1989. While there, I received the Demetri Angelakos Outstanding Graduate Student Award and the IEEE/ACM Ira M. Kay Memorial Paper Price.

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