APPLE INC., Petitioner,

v.

OMNI MEDSCI, INC., Patent Owner.

<u>Omni MedSci's Demon</u> Exhibits

U.S. Patent No. 10,517,484 IPR2021-00453 May 5, 2022

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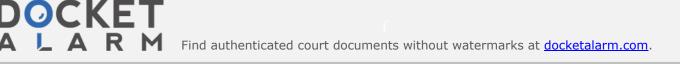
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Outline

- <u>Ground 1</u>: The "pulse rate" limitation
 - Lisogurski alone: CCM
 - Omni's evidence is unrefuted: CCM firing rate changes do r
 - Not configured to increase SNR by increasing an LED pulse rate
 - "Sampling rate" ≠ "firing rate"
 - Lisogurski + Carlson
 - Apple's combination improperly destroys CCM's principle of
- Ground 2: Claims 3, 8, and 16
 - Petition ignores differences between "to detect an obje
 - Lisogurski does not "detect an object"
 - Lisogurski does not "identify an object"
- Grounds 2–4: No motivation to combine the reference

GROUND 1: THE "PULSE R LIMITATION

Lisogurski CCM Lisogurski CCM modulating at Carlson 1000



The "pulse rate" limitation

the wearable device configured to increase the signal-to-noise ratio . . . by increasing a pulse rate of at least one of semiconductor sources from an initial pulse rate



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LISOGURSKI ALONE



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