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UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

Before the Honorable Cameron R. Elliot
Administrative Law Judge

In the Matter of **CERTAIN WEARABLE ELECTRONIC DEVICES WITH ECG FUNCTIONALITY AND COMPONENTS THEREOF**	**Inv. No. 337-TA-1266**

APPLE INC.'S POST-HEARING BRIEF

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i. 12[pre]: 12. A smartwatch, comprising: 67

ii. 12[a]: a processor;....68

iii. 12[b]: a first sensor configured to sense an activity level value of a user, wherein the first sensor is coupled to the processor; 68

iv. 12[c]: a photoplethysmogram ("PPG") sensor configured to sense a heart rate parameter of the user when the activity level value is resting, wherein the PPG sensor is coupled to the processor; 68

v. 12[d]: an electrocardiogram ("ECG") sensor configured to sense electrical signals of a heart, wherein the ECG sensor comprises a first electrode and a

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second electrode, and wherein the ECG sensor is coupled to the processor; and 69

vi. 12[e]: a non-transitory computer readable storage medium encoded with a computer program including instructions executable by the processor to cause the processor to: determine if a discordance is present between the activity level value of the user and the heart rate parameter of the user;..... 69

vii. 12[f]: based on the presence of the discordance, indicate to the user a possibility of an arrhythmia being present 70

viii. 12[g]: receive electric signals of the user from the ECG sensor to confirm the presence of the arrhythmia. 71

d. Claim 13: The smartwatch [] according to claim 12, wherein the heart rate parameter comprises an indication of a [HRV], and wherein the arrhythmia is atrial fibrillation. 72

e. Claim 16: The smartwatch or wristlet according to claim 12, wherein indicating to the user further comprises: instructing the user to record an ECG using the ECG sensor. 74

f. Claim 18: The smartwatch according to claim 12, wherein the heart rate parameter is a PPG signal. 74

g. Claim 19: The smartwatch according to claim 18, wherein the heart rate parameter is a heartrate variability ("HRV") value, wherein the HRV value is derived from the PPG signal. 74

h. Claim 20: The smartwatch according to claim 18, wherein the heart rate parameter is a heartrate, wherein the heartrate is derived from the PPG signal. . 75

i. Claim 21: The smartwatch according to claim 12, the processor further to: display an ECG rhythm strip from the electric signals. 75

j. Claim 22: The smartwatch according to claim 12, wherein the PPG sensor is located on a back of the smartwatch. 76

k. Claim 23: The smartwatch according to claim 12, wherein the first electrode is located on the smartwatch where the first electrode contacts a first side of the user's body while the user wears the smartwatch, and the second electrode is located on the smartwatch where the user must actively contact the second electrode with a second side of the user's body opposite from the first side. 76

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ii. 1[a]: a processing device; 96
iii. 1[b]: a photoplethysmography ("PPG") sensor operatively coupled to the processing device; 96
iv. i1[c]: an ECG sensor, comprising two or more ECG electrodes, the ECG sensor operatively coupled to the processing device; 97
v. 1[d]: a display operatively coupled to the processing device; and 97

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