

Exhibit C

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,

Petitioner,

v.

JAWBONE INNOVATIONS, LLC,

Patent Owner.

Patent No. 10,779,080

Filing Date: July 22, 2013

Issue Date: September 15, 2020

Inventor: Gregory C. Burnett

Title: DUAL OMNIDIRECTIONAL MICROPHONE ARRAY (DOMA)

PATENT OWNER'S PRELIMINARY RESPONSE

Case No. IPR2024-00350

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<i>Net MoneyIN, Inc. v. VeriSign, Inc.</i> , 545 F.3d 1359 (Fed. Cir. 2008)	19
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EXHIBIT LIST

Exhibit No.	Description of Document
2001	Declaration of Akbar M. Sayeed, Ph.D.
2002	Curriculum Vitae of Akbar M. Sayeed, Ph.D.
2003	Excerpts of MICROPHONE ARRAYS: SIGNAL PROCESSING TECHNIQUES AND APPLICATIONS, Ch. 18, Future Directions in Microphone Array Processing (Michael Brandstein & Darren Ward eds., Springer-Verlag 2001) (“Brandstein”)

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