Apple Inc. (Petitioner) v. Masimo Corporation (Patent Owner)

Petitioner Demonstratives

Case Nos. IPR2021-00193, -00195, -00208, -00209
U.S. Patent Nos. 10,299,708; 10,376,190; 10,258,266; 10,376,191
Before Hon. Josiah C. Cocks, Robert L. Kinder, Amanda F. Wieker
Administrative Patent Judges



DEMONSTRATIVE EXHIBIT - NOT EVIDENCE



Table of Contents

Issue 1: Implementing a Cover with a Protruding Convex Surface	3
1A: The Cover's Protruding Convex Surface would Enhance Light Gathering Ability	5
1B: The Cover's Protruding Convex Surface would Improve Adhesion and Signal Strength	24
Issue 2: Adding a Second Emitter to Aizawa	35
Issue 3: Circular/Cylindrical Housing	43
Overview of the Challenged Patents	45
Overview of the Instituted Grounds	54



2

FMONSTRATIVE EXHIBIT – NOT EVIDENCI

Issue 1

Implementing a Cover with a Protruding Convex Surface

Case Nos. IPR2021-00193, -00195, -00208, -00209 U.S. Patent Nos. 10,299,708; 10,376,190; 10,258,266; 10,376,191



3

DEMONSTRATIVE EXHIBIT – NOT EVIDENC



Multiple Benefits of Combining the References

Dr. Kenny's Second Declaration

A. Inokawa's lens enhances the light-gathering ability of Aizawa

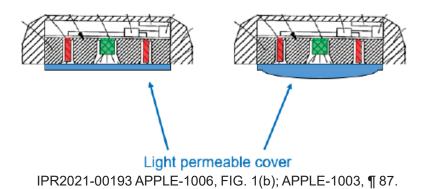
7. As I previously explained in the Original Declaration, Inokawa *very generally* describes a "lens [that] makes it possible to increase the light-gathering ability" of a reflectance type pulse sensor, APPLE-1008, [0015], [0058], FIG. 2, and, based on this disclosure, a POSITA would have been motivated to incorporate "an Inokawa-like lens into the cover of Aizawa to increase the light collection efficiency...." APPLE-1003, ¶84-88. In a significant extrapolation from the very simple and

IPR2021-00193, APPLE-1047, ¶ 7.

- B. It would have been obvious to modify Aizawa in view of Ohsaki to include a convex protrusion
- 35. As explained in my Original Declaration, "Ohsaki teaches that adding a convex surface...can help prevent the device from slipping on the tissue of the wearer compared to using a flat cover without such protrusion" and that "a POSITA seeking to achieve improved adhesion between the detector and the skin, as expressly recognized in Aizawa, would have been motivated and readily able to modify Aizawa's acrylic plate to have a convex shape as in Ohsaki." APPLE-1003, ¶¶125-126 (citing to APPLE-1014, [0025]; APPLE-1006, [0026], [0030]).

IPR2021-00193, APPLE-1047, ¶ 35.

<u> Aizawa</u>





DEMONSTRATIVE EXHIBIT – NOT EVIDENCE



Issue 1A

The Cover's Protruding Convex Surface would Enhance Light-Gathering Ability



5

DEMONSTRATIVE EXHIBIT – NOT EVIDENCI



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

