

Filed: March 26, 2025

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

WILLOW LABORATORIES, INC.,
Patent Owner.

Case IPR2024-00296
U.S. Patent 10,984,911

**PATENT OWNER WILLOW LABORATORIES, INC.'S
UPDATED EXHIBIT LIST AND DEMONSTRATIVES**

EXHIBIT LIST

Exhibit	Description
2001	<i>Curriculum Vitae</i> of Vijay K. Madiseti, Ph.D.
2002	March 28, 2024 Declaration of Vijay K. Madiseti, Ph.D.
2003	Commission Opinion (Public), <i>Certain Light-Based Physiological Measurement Devices and Components Thereof</i> , Inv. No. 337-TA-1276, EDIS No. 808521 (ITC Oct. 26, 2023)
2004	Decision Denying Institution of <i>Inter Partes</i> Review, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-01271, Paper 15 (PTAB Jan. 24, 2023)
2005	Decision Denying Institution of <i>Inter Partes</i> Review, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-01272, Paper 16 (PTAB Jan. 24, 2023)
2006	Decision Denying Institution of <i>Inter Partes</i> Review, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-01273, Paper 15 (PTAB Jan. 24, 2023)
2007	Decision Denying Institution of <i>Inter Partes</i> Review, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-01274, Paper 15 (PTAB Jan. 24, 2023)
2008	Decision Denying Institution of <i>Inter Partes</i> Review, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-01275, Paper 15 (PTAB Jan. 30, 2023)
2009	Decision Denying Institution of <i>Inter Partes</i> Review, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-01276, Paper 15 (PTAB Jan. 30, 2023)
2010	Plaintiff Apple Inc.'s Opposition to Defendants' Motion for Stay Pending <i>Inter Partes</i> Review (Public), <i>Apple Inc. v. Masimo Corp.</i> , No. 22-1378-MN-JLH (D. Del. Jan. 10, 2024), D.I. 457
2011	Plaintiff Apple Inc.'s Opening Brief in Support of Its Motion for an Expedited Trial, <i>Apple Inc. v. Masimo Corp.</i> , No. 22-1377-MN-JLH (D. Del. Feb. 10, 2023), D.I. 50
2012	Transcript of May 5, 2023 Hearing, <i>Apple Inc. v. Masimo Corp.</i> , Nos. 22-1377-MN-JLH, 22-1378-MN-JLH (D. Del. May 5, 2023)
2013	Original Scheduling Order, <i>Apple Inc. v. Masimo Corp.</i> , No. 22-

Exhibit	Description
	1378-MN-JLH (D. Del. May 25, 2023), D.I. 92
2014	Amended Scheduling Order, <i>Apple Inc. v. Masimo Corp.</i> , No. 22-1378-MN-JLH (D. Del. Sept. 21, 2023), D.I. 359
2015	Lex Machina Patent Case Timeline Statistics for the District of Delaware between December 12, 2022 and December 12, 2023
2016	Lex Machina Case Statistics for Magistrate Judge Jennifer Hall
2017	Lex Machina Case Statistics for District Court Judges in the District of Delaware (Judges Connolly, Noreika, Andrews, Williams, and Hall)
2018	Transcript of September 14, 2023 Markman Hearing, <i>Apple Inc. v. Masimo Corp.</i> , Nos. 22-cv-1377-MN-JLH, 22-cv-1378-MN-JLH
2019	Aaron Tilley, <i>The Entrepreneur Who Bet His Company on a Fight With Apple</i> , Wall Street J., Dec. 30, 2023, https://www.wsj.com/tech/joe-kiani-entrepreneur-apple-warning-52eb09a9
2020	Notice of Refund, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-1271, Paper 20 (PTAB June 20, 2023)
2021	Notice of Refund, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-1272, Paper 20 (PTAB June 20, 2023)
2022	Notice of Refund, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-1273, Paper 19 (PTAB June 20, 2023)
2023	Notice of Refund, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-1274, Paper 19 (PTAB June 20, 2023)
2024	Notice of Refund, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-1275, Paper 19 (PTAB June 26, 2023)
2025	Notice of Refund, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-1276, Paper 20 (PTAB June 26, 2023)
2026	Notice of Refund, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-1292,

Exhibit	Description
	Paper 17 (PTAB Mar. 7, 2023)
2027	Notice of Refund, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-1466, Paper 17 (PTAB Apr. 5, 2023)
2028	Correspondence from counsel for Apple to counsel for Masimo regarding Apple's prior art grounds in the Delaware Litigation, dated November 16, 2023
2029	Revised and Corrected Transcript of June 6, 2022 Hearing Open Sessions in <i>In re Certain Light-Based Physiological Measurement Devices and Components Thereof</i> , Inv. No. 337-TA-1276 (ITC).
2030	Excerpts of November 8, 2023 Deposition of Mohamed Diab, <i>Apple Inc. v. Masimo Corp.</i> , No. 22-1378-MN-JLH (D. Del.)
2031	Joint Claim Construction Brief Regarding Masimo Asserted Patents, <i>Apple Inc. v. Masimo Corp.</i> , No. 22-01378-MN-JLH (D. Del. Aug. 31, 2023), D.I. 295
2032	Excerpts of December 15, 2023 Rebuttal Expert Report of Steven Warren (Public), <i>Apple Inc. v. Masimo Corp.</i> , No. 22-1378-MN-JLH (D. Del.)
2033	Exhibit E-5 to Apple's June 8, 2023 Initial Invalidity Contentions based on Abdul-Hafiz (U.S. Patent Appl. Pub. No. 2004/0039272, <i>Apple Inc. v. Masimo Corp.</i> , No. 22-1378-MN-JLH (D. Del.)
2034	Exhibit E-10 to Apple's June 8, 2023 Initial Invalidity Contentions, <i>Apple Inc. v. Masimo Corp.</i> , No. 22-1378-MN-JLH (D. Del.)
2035	Exhibit E-8 to Apple's June 8, 2023 Initial Invalidity Contentions based on Masimo SET System, <i>Apple Inc. v. Masimo Corp.</i> , No. 22-1378-MN-JLH (D. Del.)
2036	Excerpts of Masimo's September 7, 2023 Responses to Apple Inc.'s Final Invalidity Contentions, <i>Apple Inc. v. Masimo Corp.</i> , No. 22-1378-MN-JLH (D. Del.)
2037	Photographs produced by Apple as APL_DEL04011694-695,

Exhibit	Description
	APL_DEL04011703-704, APL_DEL04011718-719, APL_DEL04011721, APL_DEL04011734, APL_DEL04011827, APL_DEL04011833, APL_DEL04011842
2038	Masimo LNOP & NR SpO ₂ adhesive & reusable sensors brochure, dated 2003, produced by Apple as APL_DEL00037755-756
2039	Photograph produced by Apple as APL_DEL04011705
2040	Photograph produced by Apple as APL_DEL04011717
2041	Datex-Ohmeda 3800 Pulse Oximeter TruTrak [®] + User's Manual, Datex-Ohmeda (Oct. 2002)
2042	U.S. Patent No. 7,096,054 (previously published as Abdul-Hafiz – U.S. Patent Publ. No. 2004/0039272)
2043	Masimo Patent Information, https://professional.masimo.com/company/masimo/patents/ (last visited Mar. 22, 2024)
2044	Photograph produced by Apple as APL_DEL04011734
2045	Photograph produced by Apple as APL_DEL04011735
2046	<i>Masimo Corporation Announces Masimo Rainbow SET, the World's First Pulse CO-Oximeter</i> , Masimo (Mar. 1, 2005), https://professional.masimo.com/company/news/news-media/2005#news-90640ab1-c7ae-4b6f-903a-d1faabe003c6
2047	Steven J. Barker et al., <i>Measurement of Carboxyhemoglobin and Methemoglobin by Pulse Oximetry: A Human Volunteer Study</i> , 105 <i>Anesthesiology</i> 892 (2006)
2048	Mike McEvoy, <i>Non-invasive Screening for CO and MET</i> , EMS1 (Jan. 29, 2009), https://www.ems1.com/ems-products/co-screening/articles/non-invasive-screening-for-co-and-met-rW7fnwZeumUrE2P4/
2049	Selim Suner and John McMurdy, <i>Masimo Rad-57 Pulse CO-OximeterTM for noninvasive carboxyhemoglobin measurement</i> , 6

Exhibit	Description
	Expert Rev. Med. Devices 125 (2009)
2050	Recordation of Merger Conveying Patents (including EX1007) from Ohmeda, Inc. to Datex-Ohmeda, Inc.
2051	U.S. Patent No. 7,277,741
2052	U.S. Patent No. 9,341,565
2053	Datex-Ohmeda Cardiocap™/5 Technical Reference Manual, Datex-Ohmeda (2d ed. May 9, 2007)
2054	Excerpts of Apple Watch photographs produced by Masimo as MASITC_01398584-621
2055	Excerpts of Apple Watch photographs produced by Masimo as MASITC_01402291-294
2056	Rimantas P. Buinevicius, <i>A Three-Wavelength Pulse Oximeter for Carboxyhemoglobin Determination</i> , University of Wisconsin-Madison Master of Science Thesis (1987)
2057	Jim Welch, 39 <i>The Fundamentals of Pulse Oximeters</i> , Biomedical Instrumentation & Tech. 125 (2005)
2058	Disposable Pulse Oximeter Sensors, Curbell Medical (2022)
2059	Rad-57 Operator's Manual, Masimo (2006)
2060	John Feiner et al., <i>Accuracy of Carboxyhemoglobin Detection by Pulse CO-Oximeter During Hypoxemia</i> , 117 <i>Anesthesia & Analgesia</i> 847 (2013)
2061	Masimo Signal Extraction Technology brochure, dated 2001, produced by Apple as APL_DEL00037764-771
2062	Masimo Signal Extraction Technology Technical Bulletin, dated 2001, produced by Apple as APL_DEL00037757-763
2063	Datex-Ohmeda S/5™ M-Modules Technical Reference Manual, Datex-Ohmeda (June 2005)

Exhibit	Description
2064	Excerpt of Defendant Masimo Corp.'s Letter Brief (Public) Regarding Cross-Use, <i>Apple Inc. v. Masimo Corp.</i> , No. 22-1378-MN-JLH (D. Del. Mar. 13, 2024), D.I. 621
2065	Excerpt of Transcript of March 20, 2024 Hearing, <i>Apple Inc. v. Masimo Corp.</i> , Nos. 22-cv-1377-MN-JLH, 22-cv-1378-MN-JLH
2066	Excerpt of correspondence between counsel for Apple in Delaware Litigation and counsel for Masimo regarding cross-use of Apple information in IPRs, dated March 27, 2024
2067	U.S. Patent No. 7,272,425
2068	<i>Unimed Medical Disposable SpO2 Sensor, Your Priority Choice!</i> , Unimed (Sept. 18, 2021), https://www.unimed.cn/blogs/news/unimed-medical-disposable-spo2-sensor-your-priority-choice
2069	Patent Owner Preliminary Response, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-01271, Paper 10 (PTAB Oct. 26, 2022)
2070	Patent Owner Preliminary Response, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-01272, Paper 11 (PTAB Oct. 26, 2022)
2071	Patent Owner Preliminary Response, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-01273, Paper 10 (PTAB Nov. 4, 2022)
2072	Patent Owner Preliminary Response, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-01274, Paper 10 (PTAB Nov. 4, 2022)
2073	Patent Owner Preliminary Response, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-01275, Paper 10 (PTAB Nov. 4, 2022)
2074	Patent Owner Preliminary Response, <i>Apple Inc. v. Masimo Corp.</i> , IPR2022-01276, Paper 10 (PTAB Nov. 4, 2022)
2075	<i>Apple Watch Series 6</i> , Apple (last visited Dec. 28, 2020), produced by Masimo at MASITC_00918307-327
2076	<i>Apple Watch Series 6 delivers breakthrough wellness and fitness</i>

Exhibit	Description
	<i>capabilities</i> , Apple (Sept. 15, 2020), https://www.apple.com/newsroom/2020/09/apple-watch-series-6-delivers-breakthrough-wellness-and-fitness-capabilities/ , produced by Apple at APL_MAS_ITC_00310976-989
2077	Apple Watch Series 6 Video
2078	Apple Watch Series 6 “It Already Does That” Commercial
2079	October 16, 2024 Declaration of Vijay K. Madiseti, Ph.D.
2080	Deposition Transcript of Thomas Kenny, Ph.D.
2081	Additional Excerpt of December 15, 2023 Rebuttal Expert Report of Steven Warren (Public), <i>Apple Inc. v. Masimo Corp.</i> , No. 22-1378-MN-JLH (D. Del.)
2082	Additional Excerpts of December 15, 2023 Rebuttal Expert Report of Vijay K. Madiseti, Ph.D. (Public), <i>Apple Inc., v. Masimo Corp.</i> , No. 22-1378-MN-JLH (D. Del.)
2083	Masimo’s Oral Hearing Demonstratives

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: March 26, 2025

/Douglas B. Wentzel/

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Customer No. 64,735

Attorney for Patent Owner
Willow Laboratories, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to 37 C.F.R. § 42.6(e) and with the agreement of counsel for Apple, a true and correct copy of the foregoing **PATENT OWNER WILLOW LABORATORIES, INC.'S UPDATED EXHIBIT LIST AND DEMONSTRATIVES** are being served electronically on March 26, 2025, to the e-mail addresses shown below:

W. Karl Renner, Reg. No. 41,265 Fish & Richardson P.C. 60 South Sixth Street Minneapolis, MN 55402 Tel: 202-783-5070 Fax: 877-769-7945 Email: IPR50095-0136IP2@fr.com	Roberto J. Devoto, Reg. No. 55,108 Kim H. Leung, Reg. No. 64,399 Fish & Richardson P.C. 60 South Sixth Street Minneapolis, MN 55402 Tel: 202-783-5070 Fax: 877-769-7945 Email: IPR50095-0136IP2@fr.com
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Dated: March 26, 2025

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