IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

OMNI MEDSCI, INC., Plaintiff, v. SAMSUNG ELECTRONICS, CO. LTD., SAMSUNG ELECTRONICS AMERICA, INC., FOSSIL GROUP, INC., FOSSIL STORES I, INC., FOSSIL PARTNERS, L.P., ONEPLUS TECHNOLOGY (SHENZHEN) CO., LTD., and ŌURA HEALTH OY, Defendants.	§ § § § § § § § § § § § § § §	Civil Action No. 2:24-CV-01070-JRG-RSP **JURY TRIAL DEMANDED**

PLAINTIFF'S DISCLOSURE OF ASSERTED CLAIMS
AND INFRINGEMENT CONTENTIONS

Pursuant to Patent Local Rule 3-1, Plaintiff Omni MedSci, Inc. ("Omni MedSci" or "Plaintiff") provides this disclosure of asserted claims and infringement contentions against Defendants Samsung Electronics, Co. Ltd., Samsung Electronics America, Inc. (collectively, "Samsung" or "Samsung Entities"), Fossil Group, Inc., Fossil Stores I, Inc., Fossil Partners, L.P. (collectively, "Fossil" or "Fossil Entities"), OnePlus Technology (Shenzhen) Co., Ltd. ("OnePlus"), and Ōura Health Oy ("Oura"). Plaintiff is contemporaneously providing the document production accompanying disclosure required by P. R. 3-2 at Bates range OMS_SAM0000001 - OMS_SAM0012684.

Plaintiff makes these disclosures based on the information that is presently known and publicly available, without the benefit of discovery. Plaintiff has not completed it preparation for trial and has not received discovery from Defendants or third parties, particularly of confidential, proprietary, and/or non-public documents and information that describe the accused

Omni MedSci Ex. 2004
Samsung Electronics Co. Ltd., et al., v. Omni MedSci - IPR2025-01251

instrumentalities, or discovery on past, discontinued, or other instrumentalities reasonably similar to the presently accused instrumentalities.

Plaintiff's investigations are ongoing. Plaintiff reserves the right to amend, supplement, or otherwise revise its asserted claims and infringement contentions, including but not limited to identification of infringed patents and claims and infringing instrumentalities.

I. P. R. 3-1(a): Identification of Asserted Claims

Plaintiff identifies the following claims of each patent in suit as infringed by each of the Defendants. Plaintiff reserves the right to supplement its identification of asserted claims as discovery proceeds.

Asserted Patent	Claims Asserted Against Samsung Entities	Claims Asserted Against Fossil Entities	Claims Asserted Against OnePlus	Claims Asserted Against Ōura
9,055,868 ("'868 Patent")	7, 9	7, 8, 9	7, 9	7, 9
9,651,533 ("'533 Patent")	11, 12	12	12	11, 12
10,517,484 ("'484 Patent")	8-10	8-9	8-9	n/a
10,874,304 ("'304 Patent")	11, 14-16, 19-22	11, 14, 19, 20	11, 14-16, 19-22	11-14, 19-20
11,160,455 ("'455 Patent")	1-3, 8-10, 15	1, 8	1-3, 8-10, 15	n/a
12,193,790 ("'790 Patent")	7	7	7	n/a

II. P. R. 3-1(b): Accused Instrumentalities

Plaintiff identifies the accused product, device, apparatus, system, or other instrumentality of which it is aware. Each product, device, apparatus, and/or system is identified by brand name and model number and identified in the table below.

Omni MedSci Ex. 2004
Samsung Electronics Co. Ltd., et al., v. Omni MedSci - IPR2025-01251

A. Samsung Entities

Asserted Patent	Asserted Claims	Accused Systems, Devices, and Instrumentalities
’868 Patent	7, 9	The Accused System includes a Samsung smartwatch, such as the Galaxy Watch, the Galaxy Watch Active and Active2, the Galaxy Watch3, the Galaxy Watch4, the Galaxy Watch5, the Galaxy Watch6, the Galaxy Watch7, and the Galaxy Watch Ultra; a smart phone or tablet, such as the Samsung Galaxy A series phones, the Samsung Galaxy M series phones, the Samsung Galaxy S series phones, the Samsung Galaxy Z series phones, the Samsung Galaxy Tab A series tablets, the Samsung Galaxy Tab S series tablets, and the Samsung Galaxy Tab Active series tablets; and a cloud, such as the Samsung Cloud, which collectively provide a system for measuring physiological information associated with a user (“Accused Instrumentality”). Smart phones and tablets from other manufacturers, such as OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
’533 Patent	11, 12	The Accused System includes a Samsung smartwatch, such as the Galaxy Watch, the Galaxy Watch Active and Active2, the Galaxy Watch3, the Galaxy Watch4, the Galaxy Watch5, the Galaxy Watch6, the Galaxy Watch7, and the Galaxy Watch Ultra; a smart phone or tablet, such as the Samsung Galaxy A series phones, the Samsung Galaxy M series phones, the Samsung Galaxy S series phones, the Samsung Galaxy Z series phones, the Samsung Galaxy Tab A series tablets, the Samsung Galaxy Tab S series tablets, and the Samsung Galaxy Tab Active series tablets; and a cloud, such as the Samsung Cloud, which collectively provide a measurement system for measuring physiological information associated with a user (“Accused Instrumentality”). Smart phones and tablets from other manufacturers, such as OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
’533 Patent	11, 12	The Accused System includes a Samsung Galaxy Ring; a smart phone or tablet, such as the Samsung Galaxy A series phones, the Samsung Galaxy M series phones, the Samsung Galaxy S series phones, the Samsung Galaxy Z series phones, the Samsung Galaxy Tab A series tablets, the Samsung Galaxy Tab S series tablets, and the Samsung Galaxy Tab Active series tablets; and a cloud, such as the Samsung Cloud, which collectively provide a measurement system for measuring physiological information associated with a user (“Accused Instrumentality”).
’484 Patent	8-10	The Accused System includes a Samsung smartwatch, such as the Galaxy Watch, the Galaxy Watch Active and Active2, the Galaxy Watch3, the Galaxy Watch4, the Galaxy Watch5, the Galaxy Watch6, the Galaxy Watch7, and the Galaxy Watch Ultra; a smart

Omni MedSci Ex. 2004
Samsung Electronics Co. Ltd., et al., v. Omni MedSci - IPR2025-01251

		phone or tablet, such as the Samsung Galaxy A series phones, the Samsung Galaxy M series phones, the Samsung Galaxy S series phones, the Samsung Galaxy Z series phones, the Samsung Galaxy Tab A series tablets, the Samsung Galaxy Tab S series tablets, and the Samsung Galaxy Tab Active series tablets; and a cloud, such as the Samsung Cloud, which collectively provide a system for measuring one or more physiological parameters of a user and for use with a smart phone or tablet ("Accused Instrumentality"). Smart phones and tablets from other manufacturers, such as OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
'304 Patent	11, 14-16	The Accused System includes a Samsung smartwatch, such as the Galaxy Watch, the Galaxy Watch Active and Active2, the Galaxy Watch3, the Galaxy Watch4, the Galaxy Watch5, the Galaxy Watch6, the Galaxy Watch7, and the Galaxy Watch Ultra; a smart phone or tablet, such as the Samsung Galaxy A series phones, the Samsung Galaxy M series phones, the Samsung Galaxy S series phones, the Samsung Galaxy Z series phones, the Samsung Galaxy Tab A series tablets, the Samsung Galaxy Tab S series tablets, and the Samsung Galaxy Tab Active series tablets; and a cloud, such as the Samsung Cloud, which collectively provide a measurement system for measuring one or more physiological parameters of a user ("Accused Instrumentality"). Smart phones and tablets from other manufacturers, such as OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
'304 Patent	19-22	The Accused Wearable Device is a Samsung smartwatch, such as the Galaxy Watch, the Galaxy Watch Active and Active2, the Galaxy Watch3, the Galaxy Watch4, the Galaxy Watch5, the Galaxy Watch6, the Galaxy Watch7, and the Galaxy Watch Ultra, which is a wearable measurement device for measuring one or more physiological parameters of a user ("Accused Instrumentality").
'304 Patent	11, 14	The Accused System includes a Samsung Galaxy Ring; a smart phone or tablet, such as the Samsung Galaxy A series phones, the Samsung Galaxy M series phones, the Samsung Galaxy S series phones, the Samsung Galaxy Z series phones, the Samsung Galaxy Tab A series tablets, the Samsung Galaxy Tab S series tablets, and the Samsung Galaxy Tab Active series tablets; and a cloud, such as the Samsung Cloud, which collectively provide a measurement system for measuring one or more physiological parameters of a user ("Accused Instrumentality"). Smart phones and tablets from other manufacturers, such as OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.

’304 Patent	19, 20	The Accused Wearable Device the Samsung Galaxy Ring, which is a wearable measurement device for measuring one or more physiological parameters of a user (“Accused Instrumentality”).
’455 Patent	1-3, 8-10, 15	The Accused System includes a Samsung smartwatch, such as the Galaxy Watch, the Galaxy Watch Active and Active2, the Galaxy Watch3, the Galaxy Watch4, the Galaxy Watch5, the Galaxy Watch6, the Galaxy Watch7, and the Galaxy Watch Ultra; a smart phone or tablet, such as the Samsung Galaxy A series phones, the Samsung Galaxy M series phones, the Samsung Galaxy S series phones, the Samsung Galaxy Z series phones, the Samsung Galaxy Tab A series tablets, the Samsung Galaxy Tab S series tablets, and the Samsung Galaxy Tab Active series tablets; and a cloud, such as the Samsung Cloud, which collectively provide a system for measuring one or more physiological parameters of a user (“Accused Instrumentality”). Smart phones and tablets from other manufacturers, such as OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
’790 Patent	7	The Accused System includes a Samsung smartwatch, such as the Galaxy Watch, the Galaxy Watch Active and Active2, the Galaxy Watch3, the Galaxy Watch4, the Galaxy Watch5, the Galaxy Watch6, the Galaxy Watch7, and the Galaxy Watch Ultra, which is a wearable device for measuring one or more physiological parameters of a user (“Accused Instrumentality”).

B. Fossil Entities

Asserted Patent	Asserted Claims	Accused Systems, Devices, and Instrumentalities
’868 Patent	7-9	The Accused System includes a Fossil smartwatch, such as the Fossil Gen 1 series watches, the Fossil Gen 2 series watches, the Fossil Gen 3 series watches, the Fossil Gen 4 series watches, the Fossil Gen 5 series watches, and the Fossil Gen 6 series watches; a smartphone or tablet, and a cloud provided by Fossil’s cloud service providers, which collectively provide a system for measuring physiological information associated with a user (“Accused Instrumentality”). Smart phones and tablets from various manufacturers, such as Samsung and OnePlus, and clouds provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
’533 Patent	12	The Accused System includes a Fossil smartwatch, such as the Fossil Gen 1, the Fossil Gen 2 series watches, the Fossil Gen 3 series watches, the Fossil Gen 4 series watches, the Fossil Gen 5 series watches, and the Fossil Gen 6 series watches; a smartphone or tablet, and a cloud provided by Fossil’s cloud service providers, which collectively provide a measurement system for measuring

		physiological information associated with a user ("Accused Instrumentality"). Smart phones and tablets from various manufacturers, such as Samsung and OnePlus, and clouds provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
'484 Patent	8-9	The Accused System includes a Fossil smartwatch, such as the Fossil Gen 1, the Fossil Gen 2 series watches, the Fossil Gen 3 series watches, the Fossil Gen 4 series watches, the Fossil Gen 5 series watches, and the Fossil Gen 6 series watches; a smartphone or tablet, and a cloud provided by Fossil's cloud service providers, which collectively provide a system for measuring one or more physiological parameters of a user ("Accused Instrumentality"). Smart phones and tablets from various manufacturers, such as Samsung and OnePlus, and clouds provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
'304 Patent	11, 14	The Accused System includes a Fossil smartwatch, such as the Fossil Gen 1, the Fossil Gen 2 series watches, the Fossil Gen 3 series watches, the Fossil Gen 4 series watches, the Fossil Gen 5 series watches, and the Fossil Gen 6 series watches; a smartphone or tablet, and a cloud provided by Fossil's cloud service providers, which collectively provide a measurement system for measuring one or more physiological parameters of a user ("Accused Instrumentality"). Smart phones and tablets from various manufacturers, such as Samsung and OnePlus, and clouds provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
'304 Patent	19, 20	The Accused Wearable Device is a Fossil smartwatch, such as the Fossil Gen 1, the Fossil Gen 2 series watches, the Fossil Gen 3 series watches, the Fossil Gen 4 series watches, the Fossil Gen 5 series watches, and the Fossil Gen 6 series watches, which is a wearable measurement device for measuring one or more physiological parameters of a user ("Accused Instrumentality").
'455 Patent	1, 8	The Accused System includes a Fossil smartwatch, such as the Fossil Gen 1, the Fossil Gen 2 series watches, the Fossil Gen 3 series watches, the Fossil Gen 4 series watches, the Fossil Gen 5 series watches, and the Fossil Gen 6 series watches; a smartphone or tablet, and a cloud provided by Fossil's cloud service providers, which collectively provide a system for measuring one or more physiological parameters of a user ("Accused Instrumentality"). Smart phones and tablets from various manufacturers, such as Samsung and OnePlus, and clouds provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
'790 Patent	7	The Accused System includes a Fossil smartwatch, such as Fossil Gen 1 series, Fossil Gen 2 series, Fossil Gen 3 series, Fossil Gen 4 series, Fossil Gen 5 series, and Fossil Gen 6 series, which is a

		wearable device for measuring one or more physiological parameters of a user ("Accused Instrumentality").

C. OnePlus

Asserted Patent	Asserted Claims	Accused Systems, Devices, and Instrumentalities
'868 Patent	7, 9	The Accused System includes a OnePlus smartwatch, such as OnePlus Watch, OnePlus Watch 2, and OnePlus Watch 2R series watches; an Android OS smartphone or tablet, such as OnePlus 6 and 6T, OnePlus 7 and 7 Pro, OnePlus 7T and 7T Pro, OnePlus 8 and 8 Pro, OnePlus 8T, OnePlus 9 and 9 Pro, OnePlus 10 Pro and 10T, OnePlus Ace Pro, OnePlus 11 and 11R, OnePlus 12 and 12R, OnePlus Open, and OnePlus Nord N30 series smartphones, as well as OnePlus Pad and OnePlus Pad 2 series tablets, and a cloud, such as OnePlus cloud service, which collectively provide a system for measuring physiological information associated with a user ("Accused Instrumentality"). Smartphones and tablets from various manufacturers, such as Samsung, and cloud-based services provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
'533 Patent	12	The Accused System includes a OnePlus smartwatch, such as OnePlus Watch, OnePlus Watch 2, and OnePlus Watch 2R series watches; an Android OS smartphone or tablet, such as OnePlus 6 and 6T, OnePlus 7 and 7 Pro, OnePlus 7T and 7T Pro, OnePlus 8 and 8 Pro, OnePlus 8T, OnePlus 9 and 9 Pro, OnePlus 10 Pro and 10T, OnePlus Ace Pro, OnePlus 11 and 11R, OnePlus 12 and 12R, OnePlus Open, and OnePlus Nord N30 series smartphones, as well as OnePlus Pad and OnePlus Pad 2 series tablets, and a cloud, such as OnePlus cloud service, which collectively provide a measurement system for measuring physiological information associated with a user ("Accused Instrumentality"). Smartphones and tablets from various manufacturers, such as Samsung, and cloud-based services provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
'484 Patent	8-9	The Accused System includes a OnePlus smartwatch, such as OnePlus Watch, OnePlus Watch 2, and OnePlus Watch 2R series watches; an Android OS smartphone or tablet, such as OnePlus 6 and 6T, OnePlus 7 and 7 Pro, OnePlus 7T and 7T Pro, OnePlus 8 and 8 Pro, OnePlus 8T, OnePlus 9 and 9 Pro, OnePlus 10 Pro and 10T, OnePlus Ace Pro, OnePlus 11 and 11R, OnePlus 12 and 12R, OnePlus Open, and OnePlus Nord N30 series smartphones, as well as OnePlus Pad and OnePlus Pad 2 series tablets, and a cloud, such as OnePlus cloud service, which collectively provide a system for measuring one or more physiological parameters of a user

		("Accused Instrumentality"). Smartphones and tablets from various manufacturers, such as Samsung, and cloud-based services provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
'304 Patent	11, 14-16	The Accused System includes a OnePlus smartwatch, such as OnePlus Watch, OnePlus Watch 2, and OnePlus Watch 2R series watches; an Android OS smartphone or tablet, such as OnePlus 6 and 6T, OnePlus 7 and 7 Pro, OnePlus 7T and 7T Pro, OnePlus 8 and 8 Pro, OnePlus 8T, OnePlus 9 and 9 Pro, OnePlus 10 Pro and 10T, OnePlus Ace Pro, OnePlus 11 and 11R, OnePlus 12 and 12R, OnePlus Open, and OnePlus Nord N30 series smartphones, as well as OnePlus Pad and OnePlus Pad 2 series tablets, and a cloud, such as OnePlus cloud service, which collectively provide a measurement system for measuring one or more physiological parameters of a user ("Accused Instrumentality"). Smartphones and tablets from various manufacturers, such as Samsung, and cloud-based services provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
'304 Patent	19-22	The Accused Wearable Device is a OnePlus smartwatch, such as OnePlus Watch, OnePlus Watch 2, and OnePlus Watch 2R series watches, which is a wearable measurement device for measuring one or more physiological parameters of a user ("Accused Instrumentality").
'455 Patent	1-3, 8-10, 15	The Accused System includes a OnePlus smartwatch, such as OnePlus Watch, OnePlus Watch 2, and OnePlus Watch 2R series watches; an Android OS smartphone or tablet, such as OnePlus 6 and 6T, OnePlus 7 and 7 Pro, OnePlus 7T and 7T Pro, OnePlus 8 and 8 Pro, OnePlus 8T, OnePlus 9 and 9 Pro, OnePlus 10 Pro and 10T, OnePlus Ace Pro, OnePlus 11 and 11R, OnePlus 12 and 12R, OnePlus Open, and OnePlus Nord N30 series smartphones, as well as OnePlus Pad and OnePlus Pad 2 series tablets, and a cloud, such as OnePlus cloud service, which collectively provide a system for measuring one or more physiological parameters of a user ("Accused Instrumentality"). Smartphones and tablets from various manufacturers, such as Samsung, and cloud-based services provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
'790 Patent	7	The Accused System includes at least a OnePlus smartwatch, such as OnePlus Watch, OnePlus Watch 2, and OnePlus Watch 2R series watch, which is a wearable device for measuring one or more physiological parameters of a user ("Accused Instrumentality").

D. Oura

Asserted Patent	Asserted Claims	Accused Systems, Devices, and Instrumentalities
’868 Patent	7, 9	The Accused System includes an Oura smart ring, such as Oura Ring Generation 1, Oura Ring Generation 2, and Oura Ring Generation 3, a smartphone or tablet, and a cloud, such as Oura Cloud, which collectively provide a system for measuring physiological information associated with a user (“Accused Instrumentality”). Smart phones and tablets from various manufacturers, such as Samsung and OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
’533 Patent	11, 12	The Accused System includes an Oura smart ring, such as Oura Ring Generation 1, Oura Ring Generation 2, and Oura Ring Generation 3, a smartphone or tablet, and a cloud, such as Oura Cloud, which collectively provide a measurement system for measuring physiological information associated with a user (“Accused Instrumentality”). Smart phones and tablets from various manufacturers, such as Samsung and OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
’304 Patent	11-14	The Accused System includes an Oura smart ring, such as Oura Ring Generation 1, Oura Ring Generation 2, and Oura Ring Generation 3, a smartphone or tablet, and a cloud, such as Oura Cloud, which collectively provide a measurement system for measuring one or more physiological parameters of a user (“Accused Instrumentality”). Smart phones and tablets from various manufacturers, such as Samsung and OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
’304 Patent	19-20	The Accused Wearable Device is an Oura smart ring, such as Oura Ring Generation 1, Oura Ring Generation 2, and Oura Ring Generation 3, which is a wearable measurement device for measuring one or more physiological parameters of a user (“Accused Instrumentality”).

Plaintiff reserves the right to identify additional accused instrumentalities as discovery commences and its investigation continues.

Omni MedSci Ex. 2004
Samsung Electronics Co. Ltd., et al., v. Omni MedSci - IPR2025-01251

III. P. R. 3-1(c) and (d) Infringement Claim Charts

Plaintiff provides claim charts, which are incorporated by reference, as if fully set forth herein, identifying how each element of the asserted claim is found within the accused instrumentalities.

A. Samsung Entities

Ex. #	Asserted Patent	Asserted Claims	Accused Systems, Devices, and Instrumentalities
1	’868 Patent	7, 9	The Accused System includes a Samsung smartwatch, such as the Galaxy Watch, the Galaxy Watch Active and Active2, the Galaxy Watch3, the Galaxy Watch4, the Galaxy Watch5, the Galaxy Watch6, the Galaxy Watch7, and the Galaxy Watch Ultra; a smart phone or tablet, such as the Samsung Galaxy A series phones, the Samsung Galaxy M series phones, the Samsung Galaxy S series phones, the Samsung Galaxy Z series phones, the Samsung Galaxy Tab A series tablets, the Samsung Galaxy Tab S series tablets, and the Samsung Galaxy Tab Active series tablets; and a cloud, such as the Samsung Cloud, which collectively provide a system for measuring physiological information associated with a user (“Accused Instrumentality”). Smart phones and tablets from other manufacturers, such as OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
2	’533 Patent	11, 12	The Accused System includes a Samsung smartwatch, such as the Galaxy Watch, the Galaxy Watch Active and Active2, the Galaxy Watch3, the Galaxy Watch4, the Galaxy Watch5, the Galaxy Watch6, the Galaxy Watch7, and the Galaxy Watch Ultra; a smart phone or tablet, such as the Samsung Galaxy A series phones, the Samsung Galaxy M series phones, the Samsung Galaxy S series phones, the Samsung Galaxy Z series phones, the Samsung Galaxy Tab A series tablets, the Samsung Galaxy Tab S series tablets, and the Samsung Galaxy Tab Active series tablets; and a cloud, such as the Samsung Cloud, which collectively provide a measurement system for measuring physiological information associated with a user (“Accused Instrumentality”). Smart phones and tablets from other manufacturers, such as OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
3	’533 Patent	11, 12	The Accused System includes a Samsung Galaxy Ring; a smart phone or tablet, such as the Samsung Galaxy A series

Omni MedSci Ex. 2004
Samsung Electronics Co. Ltd., et al., v. Omni MedSci - IPR2025-01251

			phones, the Samsung Galaxy M series phones, the Samsung Galaxy S series phones, the Samsung Galaxy Z series phones, the Samsung Galaxy Tab A series tablets, the Samsung Galaxy Tab S series tablets, and the Samsung Galaxy Tab Active series tablets; and a cloud, such as the Samsung Cloud, which collectively provide a measurement system for measuring physiological information associated with a user ("Accused Instrumentality").
4	'484 Patent	8-10	The Accused System includes a Samsung smartwatch, such as the Galaxy Watch, the Galaxy Watch Active and Active2, the Galaxy Watch3, the Galaxy Watch4, the Galaxy Watch5, the Galaxy Watch6, the Galaxy Watch7, and the Galaxy Watch Ultra; a smart phone or tablet, such as the Samsung Galaxy A series phones, the Samsung Galaxy M series phones, the Samsung Galaxy S series phones, the Samsung Galaxy Z series phones, the Samsung Galaxy Tab A series tablets, the Samsung Galaxy Tab S series tablets, and the Samsung Galaxy Tab Active series tablets; and a cloud, such as the Samsung Cloud, which collectively provide a system for measuring one or more physiological parameters of a user and for use with a smart phone or tablet ("Accused Instrumentality"). Smart phones and tablets from other manufacturers, such as OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
5	'304 Patent	11, 14-16	The Accused System includes a Samsung smartwatch, such as the Galaxy Watch, the Galaxy Watch Active and Active2, the Galaxy Watch3, the Galaxy Watch4, the Galaxy Watch5, the Galaxy Watch6, the Galaxy Watch7, and the Galaxy Watch Ultra; a smart phone or tablet, such as the Samsung Galaxy A series phones, the Samsung Galaxy M series phones, the Samsung Galaxy S series phones, the Samsung Galaxy Z series phones, the Samsung Galaxy Tab A series tablets, the Samsung Galaxy Tab S series tablets, and the Samsung Galaxy Tab Active series tablets; and a cloud, such as the Samsung Cloud, which collectively provide a measurement system for measuring one or more physiological parameters of a user ("Accused Instrumentality"). Smart phones and tablets from other manufacturers, such as OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
	'304 Patent	19-22	The Accused Wearable Device is a Samsung smartwatch, such as the Galaxy Watch, the Galaxy Watch Active and Active2, the Galaxy Watch3, the Galaxy Watch4, the Galaxy Watch5, the Galaxy Watch6, the Galaxy Watch7, and the Galaxy Watch Ultra, which is a wearable measurement device

			for measuring one or more physiological parameters of a user ("Accused Instrumentality").
6	'304 Patent	11, 14	The Accused System includes a Samsung Galaxy Ring; a smart phone or tablet, such as the Samsung Galaxy A series phones, the Samsung Galaxy M series phones, the Samsung Galaxy S series phones, the Samsung Galaxy Z series phones, the Samsung Galaxy Tab A series tablets, the Samsung Galaxy Tab S series tablets, and the Samsung Galaxy Tab Active series tablets; and a cloud, such as the Samsung Cloud, which collectively provide a measurement system for measuring one or more physiological parameters of a user ("Accused Instrumentality"). Smart phones and tablets from other manufacturers, such as OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
	'304 Patent	19, 20	The Accused Wearable Device the Samsung Galaxy Ring, which is a wearable measurement device for measuring one or more physiological parameters of a user ("Accused Instrumentality").
7	'455 Patent	1-3, 8-10, 15	The Accused System includes a Samsung smartwatch, such as the Galaxy Watch, the Galaxy Watch Active and Active2, the Galaxy Watch3, the Galaxy Watch4, the Galaxy Watch5, the Galaxy Watch6, the Galaxy Watch7, and the Galaxy Watch Ultra; a smart phone or tablet, such as the Samsung Galaxy A series phones, the Samsung Galaxy M series phones, the Samsung Galaxy S series phones, the Samsung Galaxy Z series phones, the Samsung Galaxy Tab A series tablets, the Samsung Galaxy Tab S series tablets, and the Samsung Galaxy Tab Active series tablets; and a cloud, such as the Samsung Cloud, which collectively provide a system for measuring one or more physiological parameters of a user ("Accused Instrumentality"). Smart phones and tablets from other manufacturers, such as OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
8	'790 Patent	7	The Accused System includes a Samsung smartwatch, such as the Galaxy Watch, the Galaxy Watch Active and Active2, the Galaxy Watch3, the Galaxy Watch4, the Galaxy Watch5, the Galaxy Watch6, the Galaxy Watch7, and the Galaxy Watch Ultra, which is a wearable device for measuring one or more physiological parameters of a user ("Accused Instrumentality").

B. Fossil Entities

Ex. #	Asserted Patent	Asserted Claims	Accused Systems, Devices, and Instrumentalities
9	’868 Patent	7-9	The Accused System includes a Fossil smartwatch, such as the Fossil Gen 1 series watches, the Fossil Gen 2 series watches, the Fossil Gen 3 series watches, the Fossil Gen 4 series watches, the Fossil Gen 5 series watches, and the Fossil Gen 6 series watches; a smartphone or tablet, and a cloud provided by Fossil’s cloud service providers, which collectively provide a system for measuring physiological information associated with a user (“Accused Instrumentality”). Smart phones and tablets from various manufacturers, such as Samsung and OnePlus, and clouds provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
10	’533 Patent	12	The Accused System includes a Fossil smartwatch, such as the Fossil Gen 1, the Fossil Gen 2 series watches, the Fossil Gen 3 series watches, the Fossil Gen 4 series watches, the Fossil Gen 5 series watches, and the Fossil Gen 6 series watches; a smartphone or tablet, and a cloud provided by Fossil’s cloud service providers, which collectively provide a measurement system for measuring physiological information associated with a user (“Accused Instrumentality”). Smart phones and tablets from various manufacturers, such as Samsung and OnePlus, and clouds provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
11	’484 Patent	8-9	The Accused System includes a Fossil smartwatch, such as the Fossil Gen 1, the Fossil Gen 2 series watches, the Fossil Gen 3 series watches, the Fossil Gen 4 series watches, the Fossil Gen 5 series watches, and the Fossil Gen 6 series watches; a smartphone or tablet, and a cloud provided by Fossil’s cloud service providers, which collectively provide a system for measuring one or more physiological parameters of a user (“Accused Instrumentality”). Smart phones and tablets from various manufacturers, such as Samsung and OnePlus, and clouds provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
12	’304 Patent	11, 14	The Accused System includes a Fossil smartwatch, such as the Fossil Gen 1, the Fossil Gen 2 series watches, the Fossil Gen 3 series watches, the Fossil Gen 4 series watches, the Fossil Gen 5 series watches, and the Fossil Gen 6 series watches; a smartphone or tablet, and a cloud provided by Fossil’s cloud service providers, which collectively provide a measurement system for measuring one or more

			physiological parameters of a user ("Accused Instrumentality"). Smart phones and tablets from various manufacturers, such as Samsung and OnePlus, and clouds provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
	'304 Patent	19, 20	The Accused Wearable Device is a Fossil smartwatch, such as the Fossil Gen 1, the Fossil Gen 2 series watches, the Fossil Gen 3 series watches, the Fossil Gen 4 series watches, the Fossil Gen 5 series watches, and the Fossil Gen 6 series watches, which is a wearable measurement device for measuring one or more physiological parameters of a user ("Accused Instrumentality").
13	'455 Patent	1, 8	The Accused System includes a Fossil smartwatch, such as the Fossil Gen 1, the Fossil Gen 2 series watches, the Fossil Gen 3 series watches, the Fossil Gen 4 series watches, the Fossil Gen 5 series watches, and the Fossil Gen 6 series watches; a smartphone or tablet, and a cloud provided by Fossil's cloud service providers, which collectively provide a system for measuring one or more physiological parameters of a user ("Accused Instrumentality"). Smart phones and tablets from various manufacturers, such as Samsung and OnePlus, and clouds provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
14	'790 Patent	7	The Accused System includes a Fossil smartwatch, such as Fossil Gen 1 series, Fossil Gen 2 series, Fossil Gen 3 series, Fossil Gen 4 series, Fossil Gen 5 series, and Fossil Gen 6 series, which is a wearable device for measuring one or more physiological parameters of a user ("Accused Instrumentality").

C. <u>OnePlus</u>

Ex. #	Asserted Patent	Asserted Claims	Accused Systems, Devices, and Instrumentalities
15	'868 Patent	7, 9	The Accused System includes a OnePlus smartwatch, such as OnePlus Watch, OnePlus Watch 2, and OnePlus Watch 2R series watches; an Android OS smartphone or tablet, such as OnePlus 6 and 6T, OnePlus 7 and 7 Pro, OnePlus 7T and 7T Pro, OnePlus 8 and 8 Pro, OnePlus 8T, OnePlus 9 and 9 Pro, OnePlus 10 Pro and 10T, OnePlus Ace Pro, OnePlus 11 and 11R, OnePlus 12 and 12R, OnePlus Open, and OnePlus Nord N30 series smartphones, as well as OnePlus Pad and OnePlus Pad 2 series tablets, and a cloud, such as OnePlus cloud service, which collectively provide a system for measuring physiological information associated with a user ("Accused

			Instrumentality”). Smartphones and tablets from various manufacturers, such as Samsung, and cloud-based services provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
16	’533 Patent	12	The Accused System includes a OnePlus smartwatch, such as OnePlus Watch, OnePlus Watch 2, and OnePlus Watch 2R series watches; an Android OS smartphone or tablet, such as OnePlus 6 and 6T, OnePlus 7 and 7 Pro, OnePlus 7T and 7T Pro, OnePlus 8 and 8 Pro, OnePlus 8T, OnePlus 9 and 9 Pro, OnePlus 10 Pro and 10T, OnePlus Ace Pro, OnePlus 11 and 11R, OnePlus 12 and 12R, OnePlus Open, and OnePlus Nord N30 series smartphones, as well as OnePlus Pad and OnePlus Pad 2 series tablets, and a cloud, such as OnePlus cloud service, which collectively provide a measurement system for measuring physiological information associated with a user (“Accused Instrumentality”). Smartphones and tablets from various manufacturers, such as Samsung, and cloud-based services provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
17	’484 Patent	8-9	The Accused System includes a OnePlus smartwatch, such as OnePlus Watch, OnePlus Watch 2, and OnePlus Watch 2R series watches; an Android OS smartphone or tablet, such as OnePlus 6 and 6T, OnePlus 7 and 7 Pro, OnePlus 7T and 7T Pro, OnePlus 8 and 8 Pro, OnePlus 8T, OnePlus 9 and 9 Pro, OnePlus 10 Pro and 10T, OnePlus Ace Pro, OnePlus 11 and 11R, OnePlus 12 and 12R, OnePlus Open, and OnePlus Nord N30 series smartphones, as well as OnePlus Pad and OnePlus Pad 2 series tablets, and a cloud, such as OnePlus cloud service, which collectively provide a system for measuring one or more physiological parameters of a user (“Accused Instrumentality”). Smartphones and tablets from various manufacturers, such as Samsung, and cloud-based services provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
18	’304 Patent	11, 14-16	The Accused System includes a OnePlus smartwatch, such as OnePlus Watch, OnePlus Watch 2, and OnePlus Watch 2R series watches; an Android OS smartphone or tablet, such as OnePlus 6 and 6T, OnePlus 7 and 7 Pro, OnePlus 7T and 7T Pro, OnePlus 8 and 8 Pro, OnePlus 8T, OnePlus 9 and 9 Pro, OnePlus 10 Pro and 10T, OnePlus Ace Pro, OnePlus 11 and 11R, OnePlus 12 and 12R, OnePlus Open, and OnePlus Nord N30 series smartphones, as well as OnePlus Pad and OnePlus Pad 2 series tablets, and a cloud, such as OnePlus cloud service, which collectively provide a measurement system for measuring one or more physiological parameters of a user (“Accused Instrumentality”). Smartphones and tablets from

			various manufacturers, such as Samsung, and cloud-based services provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
	’304 Patent	19-22	The Accused Wearable Device is a OnePlus smartwatch, such as OnePlus Watch, OnePlus Watch 2, and OnePlus Watch 2R series watches, which is a wearable measurement device for measuring one or more physiological parameters of a user (“Accused Instrumentality”).
19	’455 Patent	1-3, 8-10, 15	The Accused System includes a OnePlus smartwatch, such as OnePlus Watch, OnePlus Watch 2, and OnePlus Watch 2R series watches; an Android OS smartphone or tablet, such as OnePlus 6 and 6T, OnePlus 7 and 7 Pro, OnePlus 7T and 7T Pro, OnePlus 8 and 8 Pro, OnePlus 8T, OnePlus 9 and 9 Pro, OnePlus 10 Pro and 10T, OnePlus Ace Pro, OnePlus 11 and 11R, OnePlus 12 and 12R, OnePlus Open, and OnePlus Nord N30 series smartphones, as well as OnePlus Pad and OnePlus Pad 2 series tablets, and a cloud, such as OnePlus cloud service, which collectively provide a system for measuring one or more physiological parameters of a user (“Accused Instrumentality”). Smartphones and tablets from various manufacturers, such as Samsung, and cloud-based services provided by others, such as Samsung or Strava, may also be used as part of the Accused System.
20	’790 Patent	7	The Accused System includes at least a OnePlus smartwatch, such as OnePlus Watch, OnePlus Watch 2, and OnePlus Watch 2R series watch, which is a wearable device for measuring one or more physiological parameters of a user (“Accused Instrumentality”).

D. Oura

Ex. #	Asserted Patent	Asserted Claims	Accused Systems, Devices, and Instrumentalities
21	’868 Patent	7, 9	The Accused System includes an Oura smart ring, such as Oura Ring Generation 1, Oura Ring Generation 2, and Oura Ring Generation 3, a smartphone or tablet, and a cloud, such as Oura Cloud, which collectively provide a system for measuring physiological information associated with a user (“Accused Instrumentality”). Smart phones and tablets from various manufacturers, such as Samsung and OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
22	’533 Patent	11, 12	The Accused System includes an Oura smart ring, such as Oura Ring Generation 1, Oura Ring Generation 2, and Oura Ring Generation 3, a smartphone or tablet, and a cloud, such

			as Oura Cloud, which collectively provide a measurement system for measuring physiological information associated with a user ("Accused Instrumentality"). Smart phones and tablets from various manufacturers, such as Samsung and OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
23	'304 Patent	11-14	The Accused System includes an Oura smart ring, such as Oura Ring Generation 1, Oura Ring Generation 2, and Oura Ring Generation 3, a smartphone or tablet, and a cloud, such as Oura Cloud, which collectively provide a measurement system for measuring one or more physiological parameters of a user ("Accused Instrumentality"). Smart phones and tablets from various manufacturers, such as Samsung and OnePlus, and clouds provided by others, such as Strava, may also be used as part of the Accused System.
	'304 Patent	19-20	The Accused Wearable Device is an Oura smart ring, such as Oura Ring Generation 1, Oura Ring Generation 2, and Oura Ring Generation 3, which is a wearable measurement device for measuring one or more physiological parameters of a user ("Accused Instrumentality").

These claim charts are exemplary and are not meant to limit the evidence Plaintiff will use to prove infringement by Defendants. Further, the annotations to figures are provided for illustrative purposes. References and descriptions provided in conjunction with one claim within a chart are applicable to other claims within the chart with respect to the same or similar elements and limitations. Plaintiff intends to rely on information gathered from documents produced by Defendants to show infringement. Plaintiff reserves the right to use this information to show that certain accused instrumentalities are representative.

Plaintiff reserves the right to supplement its infringement contentions based on information learned through discovery, including information provided by Defendants and/or third parties. Plaintiff reserves the right and expects to rely on documents, testimony, and other evidence obtained through discovery to prove infringement in this case. Plaintiff reserves the right to rely on expert testimony to show infringement. These claim charts are not intended to and do not construe the claims of the Asserted Patents and do not limit Plaintiff's contentions.

Omni MedSci Ex. 2004
Samsung Electronics Co. Ltd., et al., v. Omni MedSci - IPR2025-01251

E. Direct Infringement

Plaintiff contends that Defendants, directly and/or through their subsidiaries, affiliates, agents, and/or business partners, has in the past and continues to directly infringe the Asserted Claims under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, by making, having made, using, selling, offering to sell, and/or importing Accused Systems/Accused Devices with the Accused Instrumentalities that embody the inventions in the Asserted Claims, within the United States. Defendants have been and are engaged in one or more of these direct infringing activities related to the Accused Systems and Accused Devices. Defendants sell them to distributors, retailers, and/or other customers throughout the United States, and actively market and support sales. Defendants' products are designed to connect to and work in concert with the smartphone and tablets through related mobile apps provided by Defendants, which phones and tablets are operable to connect to a network to communicate with cloud-based servers. Defendants have and continue to market and promote the compatibility between the various claimed system components for providing an integrated measurement systems, and users need only perform simple steps to connect products enabled with a health mobile app and supported by a cloud. On information and belief, Plaintiff further alleges that Defendants' employees, such as product development and testing engineers and/or sales and marketing personnel, have and continue directly infringe the Asserted Claims in connection with development, testing, and/or demonstration of the Accused Systems and Accused Devices.

Plaintiff contends that Defendants, directly and/or through their subsidiaries, affiliates, agents, and/or business partners, have also in the past and continue to directly infringe the Asserted Claims pursuant to 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, by

Omni MedSci Ex. 2004
Samsung Electronics Co. Ltd., et al., v. Omni MedSci - IPR2025-01251

making, having made, using, selling, offering to sell, and/or importing Accused Wearable Devices within the United States and within this District.

F. Indirect Infringement

Plaintiff contends that Defendants indirectly infringe by actively, knowingly, and/or intentionally inducing and/or contributing to the direct infringement of the Asserted Claims under 35 U.S.C. §§ 271(b), (c).

Defendants have induced and continue to induce infringement of the Asserted Claims by third parties (including distributors, end-users, and/or customers). By way of non-limiting example: upon information and belief, Defendants know that their customers, distributors, and resellers follow and/or use Defendants' support, instructions, user guides, and technical specifications and use, offer to sell, or sell the accused instrumentalities within the United States. Defendants directly benefit from, and actively and knowingly encourage, customers', distributors', and resellers' use, sale, and/or offer for sale of the accused instrumentalities.

Defendants had knowledge or were on notice of the Asserted Patents by no later than the filing of the complaint in this case.

The acts of inducement may include making, selling, offering to sell, and/or importing the accused instrumentalities to or for others, and providing others with encouragement, instructions, and training on how to use the accused instrumentalities in a manner that directly infringes the claims, all while Defendants have knowledge of the Asserted Patents and Asserted Claims, and knowledge that such use of the accused instrumentalities would infringe the Asserted Claims. Defendants affirmatively act with knowledge and specific intent to encourage and facilitate such infringing acts by others. Defendants' tutorials, user guides, and technical and marketing

Omni MedSci Ex. 2004
Samsung Electronics Co. Ltd., et al., v. Omni MedSci - IPR2025-01251

documentation for the accused instrumentalities provide specific instruction for using and actively encouraging others to use the accused instrumentalities in an infringing manner.

Affirmative acts of inducement include, but are not limited to, any one or combination of encouraging and/or facilitating the infringement of others through advertisement, marketing, and dissemination of the accused instrumentalities; creating and publishing promotional marketing materials, supporting materials, product manuals, and/or technical support and information relating to the accused instrumentalities; describing to, training, and instructing users on the implementation of the accused instrumentalities; and providing product manuals and other technical information that cause customers and other third parties to use and/or operate the accused instrumentalities for their ordinary and customary use.

Defendants took active steps to encourage end users to use and operate the accused instrumentalities despite knowing of the Asserted Patents, in a manner they knew directly infringed each element of the Asserted Claims. Defendants specifically intended and were aware that the ordinary and customary use of the accused instrumentalities would infringe one or more of the Asserted Claims.

Defendants knew that the induced conduct would constitute infringement and intended said infringement at the time of committing the aforementioned acts, such that those acts and conduct have been, and continue to be, committed with the specific intent to induce infringement, or to deliberately avoid learning of the infringing circumstances at the time these acts were committed, so as to be willfully blind to the induced infringement.

G. Doctrine of Equivalents

Plaintiff contends that Defendants infringe under the doctrine of equivalents to the extent that Defendants contend any claim elements or limitations are not found literally. Defendants have

Omni MedSci Ex. 2004
Samsung Electronics Co. Ltd., et al., v. Omni MedSci - IPR2025-01251

not specifically identified which claim elements or limitations they contend are not literally met. Should Defendants contend that any element, step, or limitation is literally absent, Plaintiff contends and reserves the right to prove that at least the equivalent of the allegedly missing element, step, or limitation is nevertheless present and that accused instrumentalities at least infringe under the doctrine of equivalents. Plaintiff anticipates that discovery will enable it to set forth the additional scope of equivalents, and therefore reserves the right to amend, supplement, or otherwise revise these contentions, and specifically as to the doctrine of equivalents.

IV. P. R. 3-1(e): Priority Date

Plaintiff identifies the priority dates to which each of the Asserted Patents are entitled that claim priority to earlier applications:

Asserted Patent	Priority Claims
’868 Patent	Provisional application No. 60/408,025, filed on Sep. 3, 2002 and drafted at least as early as Sept. 1, 2002.
’533 Patent	Provisional application No. 61/747,487, filed on Dec. 31, 2012 and drafted at least as early as Oct. 10, 2012.
’484 Patent	Provisional application No. 61/747,472, filed on Dec. 31, 2012 and drafted at least as early as Aug. 3, 2012; provisional application No. 61/747,553, filed on Dec. 31, 2012 and drafted at least as early as Dec. 21, 2012; provisional application No. 61/747,485, filed on Dec. 31, 2012 and drafted at least as early as Sept. 30, 2012; provisional application No. 61/747,487, filed on Dec. 31, 2012 and drafted at least as early as Oct. 10, 2012; provisional application No. 61/747,477, filed on Dec. 31, 2012 and drafted at least as early as Dec. 24, 2012; and provisional application No. 61/754,698, filed on Jan. 21, 2013 and drafted at least as early as Aug. 10, 2012.
’304 Patent	Provisional application No. 61/747,477, filed on Dec. 31, 2012 and drafted at least as early as Dec. 24, 2012; provisional application No. 61/754,698, filed on Jan. 21, 2013 and drafted at least as early as Aug. 10, 2012; provisional application No. 61/747,472, filed on Dec. 31, 2012 and drafted at least as early as Aug. 3, 2012; provisional application No. 61/747,553, filed on Dec. 31, 2012 and drafted at least as early as Dec. 21, 2012;

Omni MedSci Ex. 2004
Samsung Electronics Co. Ltd., et al., v. Omni MedSci - IPR2025-01251

	provisional application No. 61/747,485, filed on Dec. 31, 2012 and drafted at least as early as Sept. 30, 2012; and provisional application No. 61/747,487, filed on Dec. 31, 2012 and drafted at least as early as Oct. 10, 2012.
’455 Patent	Provisional application No. 61/747,472, filed on Dec. 31, 2012 and drafted at least as early as Aug. 3, 2012; provisional application No. 61/747,553, filed on Dec. 31, 2012 and drafted at least as early as Dec. 21, 2012; provisional application No. 61/747,485, filed on Dec. 31, 2012 and drafted at least as early as Sept. 30, 2012; provisional application No. 61/747,487, filed on Dec. 31, 2012 and drafted at least as early as Oct. 10, 2012; provisional application No. 61/747,477, filed on Dec. 31, 2012 and drafted at least as early as Dec. 24, 2012; and provisional application No. 61/754,698, filed on Jan. 21, 2013 and drafted at least as early as Aug. 10, 2012.
’790 Patent	Provisional application No. 61/754,698, filed on Jan. 21, 2013 and drafted at least as early as Aug. 10, 2012; provisional application No. 61/747,477, filed on Dec. 31, 2012 and drafted at least as early as Dec. 24, 2012; provisional application No. 61/747,472, filed on Dec. 31, 2012 and drafted at least as early as Aug. 3, 2012; provisional application No. 61/747,487, filed on Dec. 31, 2012 and drafted at least as early as Oct. 10, 2012; and provisional application No. 61/747,553, filed on Dec. 31, 2012 and drafted at least as early as Dec. 21, 2012.

Plaintiff’s investigation is ongoing. Plaintiff reserves the right to supplement its priority claim dates (and to assert any applicable prior invention dates).

V. P. R. 3.1(f): Practice of Omni MedSci, Inc.’s Patents

At this time, Plaintiff is not asserting that any product, device, apparatus, system, or other instrumentality of its own practices any of the claimed inventions. Plaintiff’s investigation is ongoing. To the extent that additional responsive, discoverable information is found, including with respect to third parties, Plaintiff reserves the right to, and will, supplement its response concerning P. R. 3-1(f), as appropriate.

Omni MedSci Ex. 2004
Samsung Electronics Co. Ltd., et al., v. Omni MedSci - IPR2025-01251

VI. Document Production and Accompanying Disclosure

Pursuant to P. R. 3-2(b), Plaintiff is producing herewith non-privileged documents evidencing the conception, reduction to practice, design, and development of each claimed invention, which were created on or before the date of application for the patent in suit or the priority date identified pursuant to P. R. 3-1(e): Bates Nos. OMS_SAM0011142 – OMS_SAM0011556 and OMS_SAM0011579 – OMS_SAM0012684.

Pursuant to P. R. 3-2(c), Plaintiff is producing herewith a copy of the file history for each of the Asserted Patents: Bates Nos. OMS_SAM0000880 – OMS_SAM0011141.

Plaintiff is not currently aware of any documents corresponding to the categories identified in P. R. 3-2(a). Plaintiff reserves the right to amend or supplement its production based on further investigation.

Omni MedSci Ex. 2004
Samsung Electronics Co. Ltd., et al., v. Omni MedSci - IPR2025-01251

Date: March 12, 2025

Respectfully submitted,

/s/ Daniel S. Stringfield w/ permission
William E. Davis, III

William E. Davis III
Texas Bar No. 24047416
DAVIS FIRM, PC
213 N. Fredonia Street, Suite 230
Longview, TX 75601
Tel: (903) 230-9090
Fax: (903) 230-9661
bdavis@davisfirm.com

Daniel S. Stringfield
Timothy P. Maloney
Dragan Gjorgiev
Peter Krusiewicz
NIXON PEABODY LLP
70 West Madison
Suite 5200
Chicago, IL 60602
Tel: (312) 977-4400
Fax: (312) 977-4405
dstringfield@nixonpeabody.com
tmaloney@nixonpeabody.com
dgjorgiev@nixonpeabody.com
pkrusiewicz@nixonpeabody.com

Elizabeth M. Chiaviello*
Benjamin R. Holt
NIXON PEABODY LLP
799 9th Street NW
Suite 500
Washington, D.C. 20001
Tel: (202) 585-8000
echiaviello@nixonpeabody.com
bholt@nixonpeabody.com

Corey T. Leggett (pro hac vice forthcoming)
NIXON PEABODY LLP
1 Embarcadero Center
32nd Floor
San Francisco, CA 94111
Tel: (415) 984-8200
cleggett@nixonpeabody.com

* Admitted to practice only in Texas; supervised by a member of the firm who is admitted to the D.C. Bar.

Attorneys for Plaintiff Omni MedSci, Inc.

Omni MedSci Ex. 2004
Samsung Electronics Co. Ltd., et al., v. Omni MedSci - IPR2025-01251

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served via electronic mail on March 12, 2025, to all opposing counsel of record.

Daniel S. Stringfield w/ permission

Daniel S. Stringfield