From: Daniel Kim
Sent: Tuesday, November 11, 2025 10:02 AM
To: omni@nixonpeabody.com; OMNI-DF@davisfirm.com; Chiaviello, Elizabeth; Georgiev, Dan
Cc: FossilOmniFishService; CT-SamsungOmniMedsci; Oura-Omni@mayerbrown.com; Omni_v_OnePlus@CJSJLAW.com
Subject: RE: Omni MedSci v. Samsung et al. (Case No. 2:24-CV-01070) - Service Email

Counsel,

In advance of the upcoming Joint Claim Construction and Prehearing Statement subject to P.R. 4-3, Defendants write to inform their withdrawal of the following terms previously identified as indefinite:

- "to use artificial intelligence to process" ('484 patent, claim 10);
- "to use artificial intelligence in making decisions" ('475 patent, claim 5).

Below are the remaining terms (no indefiniteness dispute remains):

Claim Term
"**beam**" ('533 patent, cl. 12; '304 patent, cls. 11, 19, 20; '868 patent, cls. 7, 8, 9)
"**modulate**" / "**modulating**" / "**modulation**" ('304 patent, cl. 19; '475 patent, cl. 13)
"**modulating at least one of the semiconductor sources having an initial light intensity**" ('304 patent, cl. 19)
"**modulate the light source with a modulation frequency**" ('475 patent, cl. 13)
"**one or more filters**" ('533 patent, cl. 11)
"**to identify an object**" ('484 patent, cl. 8; '790 patent, cl. 7)
"**personal device**" ('533 patent, cl. 5)

Best,
Daniel

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From: Susan Gonzales <gonzales@fr.com>
Sent: Friday, October 31, 2025 7:19 PM
To: RopesSamsungOmniMedSci1070@ropesgray.com; Oura-Omni@mayerbrown.com; Omni_v_OnePlus@CJSJLAW.com; omni@nixonpeabody.com; OMNI-DF@davisfirm.com
Cc: FossilOmniFishService <FossilOmniFishService@fr.com>
Subject: RE: Omni MedSci v. Samsung et al. (Case No. 2:24-CV-01070) - Service Email

Apologies counsel,

Here are the attachments.

From: Susan Gonzales <gonzales@fr.com>
Sent: Friday, October 31, 2025 4:18 PM
To: RopesSamsungOmniMedSci1070@ropesgray.com; Oura-Omni@mayerbrown.com; Omni_v_OnePlus@CJSJLAW.com; omni@nixonpeabody.com; OMNI-DF@davisfirm.com
Cc: FossilOmniFishService <FossilOmniFishService@fr.com>
Subject: RE: Omni MedSci v. Samsung et al. (Case No. 2:24-CV-01070) - Service Email

Counsel,

Attached for service is Defendants' Preliminary Constructions and Extrinsic Evidence Pursuant to Patent Rule 4-2 and Exhibit A.

Susan Gonzales
Litigation Paralegal to Jared A. Smith ■ Fish & Richardson P.C.

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