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. 2:25-CV-00483-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_SAM0013903.

Plaintiff makes these disclosures based on the information that is presently known and publicly available, without the benefit of discovery. Plaintiff has not completed its 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

Samsung Ex. 1022
Samsung v. Omni
PGR2025-00063
Page 00001

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
12,268,475 ("'475 Patent")	1, 5-8, 11-13	1, 5, 8, 11-13	1, 5-8, 11-13	1, 5-8, 11-13

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.

A. Samsung Entities

Asserted Patent	Asserted Claims	Accused Systems, Devices, and Instrumentalities
'475 Patent	1, 5-8, 11-13	The Accused Devices include 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, and the Samsung Galaxy Ring, each being a wearable device/apparatus configured to (i) be worn by a user and (ii) measure/determine physiological parameters of the user ("Accused Instrumentality").

B. Fossil Entities

Asserted Patent	Asserted Claims	Accused Systems, Devices, and Instrumentalities
'475 Patent	1, 5, 8, 11-13	The Accused Devices include 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, each being a wearable device/apparatus configured to (i) be worn by a user and (ii) measure/determine physiological parameters of the user ("Accused Instrumentality").

C. OnePlus

Asserted Patent	Asserted Claims	Accused Systems, Devices, and Instrumentalities
'475 Patent	1, 5-8, 11-13	The Accused Devices include a OnePlus smartwatch, such as OnePlus Watch, OnePlus Watch 2, OnePlus Watch 2R, and OnePlus Watch 3 series watches, each being a wearable device/apparatus configured to (i) be worn by a user and (ii) measure/determine physiological parameters of the user ("Accused Instrumentality").

D. Oura

Asserted Patent	Asserted Claims	Accused Systems, Devices, and Instrumentalities
'475 Patent	1, 5-8, 11-13	The Accused Devices include an Oura smart ring, such as Oura Ring Generation 1, Oura Ring Generation 2, Oura Ring Generation 3, and Oura Ring 4, each being a wearable device/apparatus configured to (i) be worn by a user and (ii) measure/determine physiological parameters of the user ("Accused Instrumentality").

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

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	'475 Patent	1, 5-8, 11-13	The Accused Devices include 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 each being a wearable device/apparatus configured to (i) be worn by a user and (ii) measure/determine physiological parameters of the user ("Accused Instrumentality").
2	'475 Patent	1, 5, 8, 11-13	The Accused Device includes the Samsung Galaxy Ring, which is a wearable device/apparatus configured to (i) be worn by a user and (ii) measure/determine physiological parameters of the user ("Accused Instrumentality").

B. Fossil Entities

Ex. #	Asserted Patent	Asserted Claims	Accused Systems, Devices, and Instrumentalities
3	'475 Patent	1, 5, 8, 11-13	The Accused Devices include 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, each being a wearable device/apparatus configured to (i) be worn by a user and (ii) measure/determine physiological parameters of the user ("Accused Instrumentality").

C. OnePlus

Ex. #	Asserted Patent	Asserted Claims	Accused Systems, Devices, and Instrumentalities
4	'475 Patent	1, 5-8, 11-13	The Accused Devices include a OnePlus smartwatch, such as OnePlus Watch, OnePlus Watch 2, OnePlus Watch 2R, and OnePlus Watch 3 series watches, each being a wearable device/apparatus configured to (i) be worn by a user and (ii) measure/determine physiological parameters of the user ("Accused Instrumentality").

D. Oura

Ex. #	Asserted Patent	Asserted Claims	Accused Systems, Devices, and Instrumentalities
5	'475 Patent	1, 5-8, 11-13	The Accused Devices include an Oura smart ring, such as Oura Ring Generation 1, Oura Ring Generation 2, Oura Ring Generation 3, and Oura Ring 4, each being a wearable device/apparatus configured to (i) be worn by a user and (ii) measure/determine physiological parameters of the 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 Patent and do not limit Plaintiff's contentions.

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 Devices with the Accused

Instrumentalities that embody the inventions in the Asserted Claims, within the United States. Defendants have been engaged, and are engaged, in one or more of these direct infringing activities related to the Accused Devices. Defendants offer to sell and 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 smartphone and tablets through related mobile apps provided by Defendants. Defendants have and continue to market and promote the Accused Devices themselves and their compatibility with mobile devices for measuring/determining physiological parameters of a user (*e.g.*, heart rate, blood oxygen level). 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 Devices.

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 Devices that feature 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 Devices.

Defendants had knowledge, or were on notice, of the Asserted Patent 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 Patent 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 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 in a manner they knew directly infringed each element of the Asserted Claims,

despite knowing of the Asserted Patent. 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 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 following priority dates corresponding to filing dates of provisional applications to which the Asserted Patent claims priority:

Asserted Patent	Priority Claims
'475 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; 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.

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 Patent

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.

VI. Document Production and Accompanying Disclosure

In co-pending Case No. 2:24-CV-01070-JRG-RSP involving the Parties, pursuant to P. R. 3-2(b), Plaintiff produced 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. Those documents further evidence the conception, reduction to practice, design, and development of each claimed invention for the Asserted Patent here, which were

created on or before the date of application for the Asserted Patent or the priority date identified pursuant to P. R. 3-1(e) above. For convenience and ease of reference, Plaintiff is reproducing such documents herewith.

In co-pending Case No. 2:24-CV-01070-JRG-RSP involving the Parties, pursuant to P. R. 3-2(c), Plaintiff produced a copy of the file history for each of the patens in suit for that case at Bates Nos. OMS_SAM0000880 – OMS_SAM0011141. For convenience and ease of reference, Plaintiff is reproducing such documents herewith, along with a copy of the file history for the Asserted Patent at Bates Nos. OMS_SAM0012685 – OMS_SAM0013903.

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.

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Respectfully submitted,

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

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Attorneys for Plaintiff Omni MedSci, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served via electronic mail on May 9, 2025, to counsel for Samsung, Fossil, and Oura.

Daniel S. Stringfield w/ permission

Daniel S. Stringfield