

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

OMNI MEDSCI, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 25-140 (WCB)
)	
WHOOP, INC.,)	
)	
Defendant.)	

**DEFENDANT WHOOP, INC.’S MOTION TO STAY PENDING
INTER PARTES AND POST GRANT REVIEW**

Defendant WHOOP, Inc. (“WHOOP”) respectfully moves to stay this case pending resolution of the PTAB review proceedings¹ concerning the six patents-in-suit: U.S. Patent Nos. 9,055,868; 9,651,533; 10,874,304; 11,160,455; 12,193,790; and 12,268,475.²

The PTAB Review proceedings were filed by WHOOP and other third parties in the related litigation styled *Omni MedSci, Inc. v. Samsung Elecs. Co., Ltd. et al.*, Case No. 2:24-cv-01070 (E.D. Tex.).

The grounds for this motion are set forth in WHOOP’s opening brief submitted herewith.

¹ *WHOOP, Inc. v. Omni MedSci, Inc.*, IPR2025-01583 (P.T.A.B.); *WHOOP, Inc. v. Omni MedSci, Inc.*, IPR2025-01584 (P.T.A.B.); *WHOOP, Inc. v. Omni MedSci, Inc.*, IPR2025-01585 (P.T.A.B.); *WHOOP, Inc. v. Omni MedSci, Inc.*, PGR2026-00003 (P.T.A.B.); *Samsung Elecs. Co. et al. v. Omni MedSci, Inc.*, IPR2025-01250 (P.T.A.B.); *Samsung Elecs. Co. et al. v. Omni MedSci, Inc.*, IPR2025-01251 (P.T.A.B.); *Samsung Elecs. Co. et al. v. Omni MedSci, Inc.*, IPR2025-01252, (P.T.A.B.); *Samsung Elecs. Co. et al. v. Omni MedSci, Inc.*, IPR2025-01253 (P.T.A.B.); *Samsung Elecs. Co. et al. v. Omni MedSci, Inc.*, PGR2025-00064 (P.T.A.B.); *Samsung Elecs. Co. et al. v. Omni MedSci, Inc.*, IPR2025-01254 (P.T.A.B.); *Samsung Elecs. Co. et al. v. Omni MedSci, Inc.*, IPR2025-00063 (P.T.A.B.); and *Samsung Elecs. Co. et al. v. Omni MedSci, Inc.*, IPR2025-01249 (P.T.A.B.).

² As noted in WHOOP’s opening brief, third-party Samsung Electronics Co., Ltd. has filed for PTAB review proceedings on the ’475 patent (Chung Decl. at Exs. 14 and 15) and WHOOP will be filing its own request as well.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

OF COUNSEL:

/s/ Jennifer Ying

Brian A. Rosenthal
Hyunjong Ryan Jin
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
(212) 351-4000

Jennifer Ying (#5550)
Travis Murray (#6882)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jying@morrisnichols.com
tmurray@morrisnichols.com

Jaysen S. Chung
GIBSON, DUNN & CRUTCHER LLP
One Embarcadero Center, Suite 2600
San Francisco, CA 94111-3715
(415) 393-8200

Attorneys for Defendant WHOOP, Inc.

Frank P. Coté
Nathaniel R. Scharn
GIBSON, DUNN & CRUTCHER LLP
3161 Michelson Drive, Suite 1200
Irvine, CA 92612-4412
(949) 451-3800
Audrey Yang
Julia G. Tabat
GIBSON, DUNN & CRUTCHER LLP
2001 Ross Avenue Suite 2100
Dallas, TX 75201-2923
(214) 698-3100

October 22, 2025

CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on October 22, 2025, upon the following in the manner indicated:

Stephen B. Braerman
Ronald P. Golden, III
Emily L. Skaug
BAYARD, P.A.
600 N. King Street, Suite 400
P.O. Box 25130
Wilmington, DE 19899
Attorneys for Plaintiff

VIA ELECTRONIC MAIL

Daniel S. Stringfield
Timothy P. Maloney
Dragan Gjorgiev
Peter Krusiewicz
NIXON PEABODY LLP
70 West Madison, Suite 5200
Chicago, IL 60602
Attorneys for Plaintiff

VIA ELECTRONIC MAIL

Corey T. Leggett
NIXON PEABODY LLP
1 Embarcadero Center, 32nd Floor
San Francisco, CA 94111
Attorneys for Plaintiff

VIA ELECTRONIC MAIL

Elizabeth M. Chiaviello
NIXON PEABODY LLP
799 9th Street NW, Suite 500
Washington, D.C. 20001
Attorneys for Plaintiff

VIA ELECTRONIC MAIL

William E. Davis, III
Ty Wilson
Davis Firm PC
213 N. Fredonia Street, Suite 230
Longview, Texas 75601
Attorneys for Plaintiff

VIA ELECTRONIC MAIL

/s/ Jennifer Ying

Jennifer Ying (#5550)