IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IMMERSION CORPORATION

vs.

APPLE INC.,

AT&T INC., and

AT&T MOBILITY LLC

Civil Action No. _____

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Immersion Corporation ("Immersion") brings this action for patent infringement against Apple Inc., AT&T Inc., and AT&T Mobility LLC (collectively, "Defendants"), and alleges as follows:

NATURE OF THE ACTION

1.   Immersion is a leading innovator and developer of haptic technologies. Since its founding in 1993, Immersion has developed and licensed haptic products and intellectual property across diverse industries and applications, including medical devices, medical training simulations, game systems and controllers, automotive devices, touchscreen controls for appliances and office equipment, and mobile electronic devices. Immersion's mission is to innovate touch technology that informs, humanizes, and excites while working with customers and partners to bring these tactile experiences to consumers.

2.   "Haptics" refers to the science of touch. Haptics are frequently integrated into mobile electronic devices, including smartphones, smartwatches, and handheld computers. Because of the importance of the sense of touch to the way we perceive our surroundings and the things with which we interact, incorporating haptics enhances the usability and functionality of those devices.
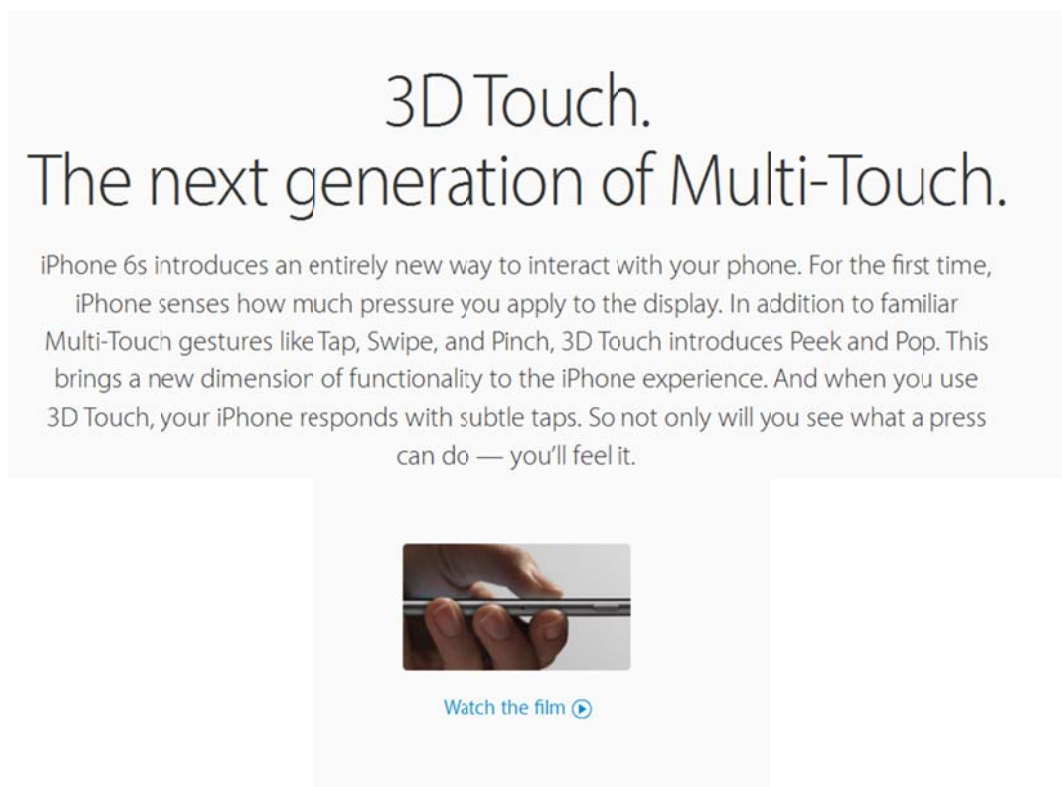
3.   Haptic feedback is especially useful in electronic devices containing touchscreens, which tend to rely on graphical elements (such as buttons, menus, and other aspects of applications) to control the device. User actions may trigger different haptic effects and thus communicate different types of information. For example, separate haptic effects may be configured for different graphical buttons, menus, or applications, or to various interactions with such graphical buttons, menus, or applications. As another example, haptic effects may be generated based on how hard the user presses on the touchscreen. Different haptic effects allow a user to differentiate the information conveyed and allow a user to easily distinguish, for example, a button press from a calendar alert from a text message alert from an incoming call.

4.   Haptic effects may also be linked to dynamic interactions with graphical objects. For example, haptic effects may be linked to expanding or contracting a two-finger zoom gesture on a mobile phone or may be based on the amount of pressure applied to the touchscreen. Haptic feedback based on dynamic interactions provides a more realistic and responsive user experience and increases user immersion when using mobile devices such as smartphones or smartwatches.
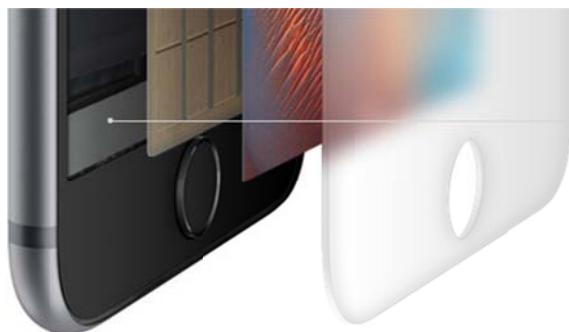
5.   Haptic sensations in consumer electronic devices often are created by one or more actuators (usually small motors) which create vibrations that can be felt by a user. Different sensations may be conveyed by varying the type, duration, intensity, or frequency at which the actuator operates. Further, a variety of tactile sensations may be accessed with reference to a lookup table containing haptic effect data for multiple tactile sensations. Similarly, the variety of tactile sensations may be implemented as an Application Programming Interface (API) library that is available to multiple applications.

6.   Immersion's hard work and ingenuity in the field of haptics has resulted in extensive intellectual property protection for Immersion's innovations. This protection includes more than 2,100 world-wide granted and pending patents, including the patents-in-suit.

7.   Haptics play a central role in Defendants' products. For example, important features of the current generation of Apple iPhones are promoted under the names "3D Touch" and "Taptic Engine."   These features of the Apple iPhone 6s and 6s Plus provide haptic feedback, including feedback based on pressure-sensitive interactions with the touch screen. Apple and AT&T tout this functionality on their websites. *See, e.g.*, Apple, iPhone 6s – 3DTouch, http://www.apple.com/iphone-6s/3d-touch/ (3D Touch):

3D Touch.
The next generation of Multi-Touch.

iPhone 6s introduces an entirely new way to interact with your phone. For the first time, iPhone senses how much pressure you apply to the display. In addition to familiar Multi-Touch gestures like Tap, Swipe, and Pinch, 3D Touch introduces Peek and Pop. This brings a new dimension of functionality to the iPhone experience. And when you use 3D Touch, your iPhone responds with subtle taps. So not only will you see what a press can do — you'll feel it.

Watch the film ▶

See also, e.g., http://www.apple.com/iphone-6s/technology/ (Taptic Engine):

All-new Taptic Engine

iPhone 6s gives you real-time feedback both onscreen and in the form of subtle taps from the Taptic Engine. These responses correspond to how deeply you're pressing the display, and they let you know what actions you're performing and what you can expect to happen.

See also, e.g., https://www.att.com/cellphones/iphone/iphone-6s.html (3D Touch advertised by AT&T):

3D Touch
The next generation of Multi-Touch.

iPhone now senses how deeply you press the display, opening up new possibilities for how to interact with your content and letting you do all kinds of essential things more quickly and simply.

8.   Important haptic features of the Apple Watch are promoted under the names "Force Touch" and "Taptic Engine." Apple touts this functionality on its website. *See* http://www.apple.com/watch/watch-reimagined/ (Force Touch):

Force Touch.
Sensitive enough to tell a tap from a press.

In addition to recognizing touch, Apple Watch senses force, adding a new dimension to the user interface. With Force Touch, pressing firmly on the display brings up additional controls in apps such as Messages, Music, and Calendar. It also lets you do things like select different watch faces, pause or end a workout, and search for an address in Maps.

See also id. (Taptic Engine):

Taptic Engine.
Technology with a more human touch.

This linear actuator inside Apple Watch taps you on the wrist when you receive a notification, press down on the display, or use Digital Touch. The Taptic Engine gives different kinds of notifications and actions their own distinct character. So even with the accompanying audio cues turned off, you can feel the difference between an alarm and an incoming phone call without even looking.

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