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 technology. Since its founding in 1993, Immersion has developed and licensed haptic products and intellectual property across diverse industries and applications, including, for example, medical devices, medical training simulations, game systems and controllers, automotive devices, touchscreen controls for appliances and office equipment, and mobile electronic devices. In recent years, a primary focus of Immersion's business has been developing products for the mobile electronic device industry, including software products for implementing advanced haptic effects, including pressure-enabled haptic effects, on mobile electronic devices.

2.   "Haptics" refers to the science of touch. Haptics in consumer electronic devices provides touch or tactile sensations to the users of electronic devices. Because of the importance of the sense of touch to the way people perceive their surroundings and the things with which they interact, haptics can greatly enhance the usability and functionality of consumer electronic

devices. Haptic sensations in such devices are typically created by actuators, or motors, which create a vibration.

3.   When haptics is implemented on a mobile phone (for example, through Immersion's TouchSense® software), users can experience a vibrating force as they push a virtual button, select a graphical object, scroll through a list, or receive a message. As another example, when haptics is implemented in a laptop computer (for example, in the laptop's touchpad), users can experience a vibrating force when they press down on the touchpad. Haptics may, for example, confirm or provide cues that an action has been performed. Predefined haptic effects may be incorporated in an electronic device to allow certain haptic effects to be associated with certain actions and allow applications to access and use the predefined haptic effects library. As another example, when implemented in a mobile game, users can feel an engine reverberation, the crack of the bat meeting the ball, or the release of a slingshot. The presence of haptics in electronic devices provides a new level of user interaction through haptic cues, which provide users with a more rich and immersive user experience.

4.   In electronic devices, haptic effects are typically managed and controlled by embedded software, and integrated into device user interfaces and applications via embedded control software APIs. Applications running on a mobile electronic device call these APIs to implement the haptic effects. These APIs in turn cause specific haptic effect commands to be sent to an actuator in the electronic device, resulting in the associated haptic feedback effect. More sophisticated applications may provide a variety of tactile sensations. For example, user actions may trigger different haptic effects and thus communicate different types of information. This information may be conveyed by varying the type, duration, intensity, or frequency of the

tactile sensations. This enables the creation of different haptic effects so that users can easily distinguish, for example, a calendar alert from a text message alert or an incoming call.

5.   Pressure-enabled haptics is a form of haptics. For example, pressure-enabled sensors may measure the pressure levels of contacts on the touchscreen. Separate haptic effects may be configured for different interactions with graphical objects, for example, touching graphical objects on the touchscreen and applying pressure at varying pressure levels. Different haptic effects may be provided depending on the pressure level of the contact on the touchscreen in relation to predefined pressure thresholds.

6.   Haptics, including pressure-enabled haptics, can be incorporated into many features of a smartphone or laptop. For example, it is especially useful in electronic devices containing touchscreens, which tend to have very few physical buttons. For example, a particular haptic effect may be used when the pressure level of the contact on the touchscreen is less than a first pressure threshold, or a particular haptic effect may be used when the pressure level of the contact on the touchscreen is between the first pressure threshold and a second pressure threshold. As another example, haptic effects in a pressure-enabled mobile device may be provided depending on whether certain conditions are met by the user's interaction with the pressure-enabled touch sensor. For example, a user may interact with a displayed graphical object on the touchscreen by applying pressure to the touchscreen. The pressure-enabled touch sensor may receive contact data from the interaction and the mobile device may determine a gesture based on the contact data. As an example, if the pressure is greater than a pressure threshold and the change in pressure is greater than a change in pressure threshold and a time interval has elapsed, a haptic effect may be provided. In this way, the user's intended interaction

may be accurately determined based on contact data from the pressure-enabled touch sensor, and the user experience enhanced.

7.   Haptic effects, including pressure-enabled haptics, may also be used to confirm receipt of a command and indicate that a command is unrecognized. For example, a user may issue a command by interacting with a graphical object on a touchscreen, *e.g.*, by applying a certain level of pressure to the touchscreen. If the user input is recognized and the command is determined, the mobile electronic device may provide a haptic effect confirming receipt of the command. Otherwise, the mobile electronic device may provide a second haptic effect. The second haptic effect may indicate, for example, that the user input is unrecognized or that a corresponding command was not found. Haptic feedback confirming receipt of a command provides a more realistic and responsive user experience, informing the user via tactile sensation whether the user's input was recognized and the command was determined.

8.   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.

9.   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):
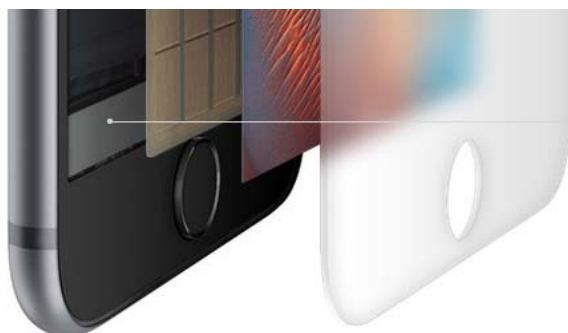
See also, e.g., http://www.apple.com/iphone-6s/technology/ (Taptic Engine):

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

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