**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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APPLE INC.,
Petitioner,

v.

IMMERSION CORPORATION,
Patent Owner.

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Case IPR2016-01372
Patent No. 8,659,571

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# DECLARATION OF YON VISELL, PH.D.

# IN SUPPORT OF IMMERSION CORPORATION'S

# PATENT OWNER RESPONSE

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# TABLE OF CONTENTS



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1. I, Yon Visell, declare as follows:

## I. INTRODUCTION

2. I have been engaged by Immersion Corporation ("Immersion") as an expert in connection with matters raised in the Petition for Inter Partes Review ("Petition") of U.S. Patent No. 8,659,571 (the "'571 patent") filed by Apple Inc. ("Apple" or "Petitioner").

3. This declaration is based on the information currently available to me. To the extent that additional information becomes available, I reserve the right to continue my investigation and study, which may include a review of documents and information that may be produced, as well as testimony from depositions that have not yet been taken.

## II. SUMMARY OF OPINIONS

4. The '571 patent is entitled "Interactivity Model for Shared Feedback on Mobile Devices." The '571 patent is directed to a novel way of producing haptic effects in electronic devices. The fundamental insight that is described and claimed in the '571 patent is that the user's gesture interactions with the device need to be tracked and analyzed in order to properly synchronize haptic feedback with a user's input. Reflecting this focus, the claims specify that both a first ***and*** a second gesture signal (each based on a user's gestural inputs) are used to generate something called a "dynamic interaction parameter."

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5. The Board instituted trial on Petitioner's Ground 1, concerning claims 1-4, 6, 23-26, and 28 of the '571 patent. Institution Decision at 45. Petitioner's Ground 1 challenges these claims as obvious under pre-AIA 35 U.S.C. § 103(a) in light of U.S. Patent Pub. No. 2010-0156818 to Burrough et al. ("Burrough"), Ex. 1005. Based on studying the petition and the exhibits cited in the petition as well as other documents, it is my opinion that claims 1-4, 6, 23-26, and 28 of the '571 patent are not rendered obvious by Burrough.

## III. QUALIFICATIONS AND EXPERIENCE

6. I obtained my Ph.D. degree in Electrical and Computer Engineering from McGill University in 2011. Before that, I received my MA in Physics from the University of Texas at Austin in 1999, and my BA in Physics from Wesleyan University in 1995.

7. Since 2015, I have worked as an Assistant Professor at UCSB. From 2013 to 2015, I worked as an Assistant Professor in the Department of Electrical and Computer Engineering at Drexel University.

8. At UCSB, I lead the RE Touch Lab as its Director and Principal Investigator. The RE Touch Lab includes six Ph.D. students and numerous affiliated researchers and undergraduate students. Some of the topics that my teams at the RE Touch Lab have explored include computational perception, such

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