

UNITED STATES INTERNATIONAL TRADE COMMISSION  
WASHINGTON, D.C.

Before The Honorable Charles E. Bullock  
Chief Administrative Law Judge

In the Matter of

CERTAIN MOBILE AND PORTABLE  
ELECTRONIC DEVICES  
INCORPORATING HAPTICS  
(INCLUDING SMARTPHONES AND  
LAPTOPS) AND COMPONENTS  
THEREOF

Inv. No. 337-TA-1004  
Inv. No. 337-TA-990  
(Consolidated)

JOINT PROPOSED CLAIM CONSTRUCTION CHART

Complainant Immersion Corporation (“Immersion” or “Complainant”) and Respondents Apple Inc. and AT&T Mobility LLC (collectively “Respondents”), by and through their respective counsel, and the Commission Investigative Staff (“Staff”), hereby submit their Joint Proposed Claim Construction Chart attached as Exhibit A as required by Order No. 9 Setting the Procedural Schedule (July 12, 2016).

Dated: October 11, 2016

Respectfully submitted,

/s/ Mark Fowler

Mark D. Fowler

Robert Buergi

Summer Torrez

Jonathan H. Hicks

Erin McLaughlin

Asa Wynn-Grant

**DLA PIPER LLP (US)**

2000 University Avenue

East Palo Alto, CA 94303-2215

Telephone: (650) 833-2000

Facsimile: (650) 833-2001

Sean C. Cunningham

Erin P. Gibson  
Robert C. Williams  
Jacob D. Anderson  
**DLA PIPER LLP (US)**  
401 B Street, Suite 2000  
San Diego, CA 92101-4240  
Telephone: (619) 699-2700  
Facsimile: (619) 699-2701

Brian K. Erickson  
Jeff R. Cole  
**DLA PIPER LLP (US)**  
401 Congress Avenue, Suite 2500  
Austin, Texas 78701-3799  
Telephone: (512) 457-7000  
Facsimile: (512) 457-7001

*Counsel for Respondent Apple Inc.*

/s/ Benjamin Hershkowitz  
Josh Krevitt  
Benjamin Hershkowitz  
George Stamatopoulos  
**GIBSON, DUNN & CRUTCHER LLP**  
200 Park Ave.  
New York, NY 10166-0193  
Telephone: (212) 351-4000  
Facsimile: (212) 351-4035

Mark Reiter  
Andrew Lin  
**GIBSON, DUNN & CRUTCHER LLP**  
2100 McKinney Ave. Ste. 1100  
Dallas, TX 75201-6912  
Telephone: (214) 698-3100  
Facsimile: (214) 571-2900

Eric T. Syu  
**GIBSON, DUNN & CRUTCHER LLP**  
3161 Michelson Dr.  
Irvine, CA 92612-4412  
Telephone: (949) 451-3800  
Facsimile: (949) 451-4220

Jill M. McCormack

**GIBSON, DUNN & CRUTCHER LLP**

1050 Connecticut Ave. NW  
Washington, DC 20036-5306  
Telephone: (202) 955-8500  
Facsimile: (202) 467-0539

*Counsel for Respondents AT&T Mobility LLC*

/s/ Barbara A. Murphy

Barbara A. Murphy

David F. Nickel

**FOSTER, MURPHY, ALTMAN & NICKEL,  
PC**

1899 L St. NW, Suite 1150  
Washington, DC 20036  
Telephone: (202) 822-4100  
Facsimile: (202) 822-4199

Morgan Chu

Richard Birnholz

Jason Sheasby

Lisa Glasser

Babak Redjaian

**IRELL & MANELLA LLP**

1800 Avenue of the Stars, Suite 900  
Los Angeles, CA 90067  
Telephone: (310) 277-1010  
Facsimile: (310) 203-7199

*Counsel for Complainant Immersion Corporation*

/s/ Lisa A. Murray

Margaret D. Macdonald, Director

David O. Lloyd, Supervisory Attorney

Lisa A. Murray, Investigative Attorney

**OFFICE OF UNFAIR IMPORT  
INVESTIGATIONS**

U.S. International Trade Commission  
500 E Street SW, Suite 401  
Washington, DC 20436  
Telephone: (202) 205-2734  
Facsimile: (202) 205-2158

# EXHIBIT A

Inv. Nos. 337-TA-1004/990: Joint List of Proposed Claim Constructions

Disputed Constructions

Patent	Term	Asserted Claims	Proposed By	Complainant	Respondents	Staff
U.S. Patent No. 8,619,051	“stored haptic effect”	1, 5, 6, 8, 11, 12, 15	Respondents	“haptic effect predefined with low-level haptic parameters such as voltage levels over time”	“haptic effect predefined with low-level parameters (such as voltage levels over time) rather than from high-level parameters”	“haptic effect predefined with low-level haptic parameters such as voltage levels over time”
	“the entire haptic output in response to the [haptic effect] request consists of the [first/ requested predefined] stored haptic effect”	1, 8, 12	Complainant, Respondents	“the haptic output is created from a single stored haptic effect, rather than by assembling a timeline of multiple stored effects in real time”	“the haptic output in response to the request is limited to a single timeslot with a single predefined stored haptic effect and is not a timeline of a series of basis haptic effects”	“the haptic output is created from a single stored haptic effect, rather than by assembling a timeline of multiple stored effects in real time”
	“digitized streamed envelope construct”	3, 9, 13	Complainant, Staff	“data format containing a stream of control information (e.g., magnitude or strength values) over time for the stored haptic effect, encoded as a sequence of bytes.”	“data format containing a stream of strength control information over time for the stored haptic effect, encoded as a sequence of bytes.”	“data format containing a stream of control information (e.g., magnitude or strength values) over time for the stored haptic effect, encoded as a sequence of bytes.”

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.