

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

IMMERSION CORPORATION,
Patent Owner.

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

**IMMERSION CORPORATION'S
PATENT OWNER RESPONSE**

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U.S. Patent and Trademark Office
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Personal Web Technologies, LLC v. Apple,
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EXHIBIT LIST

Immersion Ex. 2001	Declaration of Yon Visell, Ph.D. in Support of Immersion Corporation's Patent Owner Preliminary Response, dated October 13, 2016
Immersion Ex. 2002	Dictionary.com, http://www.dictionary.com/browse/gesture?s=t (last visited Oct. 11, 2016)
Immersion Ex. 2003	August 2, 2012 Applicant Remarks in Prosecution of U.S. Patent No. 8,279,193
Immersion Ex. 2004	U.S. Patent Application Publication No. US 2007/0279392 (Rosenberg '392)
Immersion Ex. 2005	July 19, 2012 Non-Final Rejection in Prosecution of U.S. Patent No. 8,279,193
Immersion Ex. 2006	May 16, 2012 Original Claims in Prosecution of U.S. Patent No. 8,279,193
Immersion Ex. 2007	<i>Curriculum Vitae</i> of Yon Visell, Ph.D.
Immersion Ex. 2008	Oct. 11, 2016 Joint Proposed Claim Construction Chart submitted by Apple, Immersion, and OUII Staff in ITC Investigation Nos. 337-TA-990 and 337-TA-1004
Immersion Ex. 2009	Declaration of Yon Visell, Ph.D., dated May 31, 2017
Immersion Ex. 2010	Deposition Transcript of Dr. Patrick M. Baudisch

I. INTRODUCTION

Patent Owner Immersion Corporation (“Immersion” or “Patent Owner”) submits this Response to the Board’s Decision – Institution of *Inter Partes* Review (Paper 7) (“Decision”), entered January 11, 2017 to institute *Inter Partes* Review of United States Patent No. 8,659,571 (“the ‘571 patent”) filed by Apple, Inc. (“Petitioner”).

The ‘571 claims recite applying a drive signal to a haptic output device according to a dynamic interaction parameter. The dynamic interaction parameter is generated using a first gesture signal and a second gesture signal. The Board determined that there was a reasonable likelihood that claims 1-4, 6, 23-26 and 28 of the ‘571 patent were obvious over Burrough.

Burrough discloses a system where signals S are generated by a sensing device. Each signal S merely represents a position of a finger (*e.g.* x/y position) at a moment in time. These S signals are what Petitioner points to as the first and second gesture signals. However, this mapping is at odds with the Board’s construction of “gesture signal” as “a signal indicating a movement of the body that conveys meaning or user intent.” *See* Institution Decision at 12. In particular, each signal S does not indicate a movement of the body that conveys meaning or user intent, because an x/y position, standing alone in Burrough’s system, does not

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