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

1

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

2

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

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 pre-defined 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."

- 1 -

DOCKET ALARM

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.