

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

IMMERSION CORPORATION,
Patent Owner.

Case IPR2016-01381
Patent No. 8,773,356

**IMMERSION CORPORATION'S
PATENT OWNER RESPONSE**

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TABLE OF AUTHORITIES

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Cases

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W.L. Gore & Assocs., Inc. v. Garlock, Inc.,
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EXHIBIT LIST

| | |
|-----------------------|--|
| Immersion Ex. 2001 | Declaration of Nathan J. Delson, Ph.D., dated October 11, 2016 |
| Immersion Ex. 2002 | Assignment of U.S. Patent Application Serial No. 09/487,737 to Immersion Corporation |
| Immersion Ex. 2003 | Assignment of U.S. Patent No. 8,773,356 to Immersion Corporation |
| Immersion Ex. 2004 | Microsoft Computer Dictionary (5 th ed. 2002) (Excerpt) |
| Immersion Ex. 2005 | Declaration of Nathan J. Delson, Ph.D., dated May 31, 2017 |
| Immersion Ex. 2006 | Deposition Transcript of Dr. Patrick Baudisch |
| Immersion Ex. 2007 | Roudat, Rau, Sterz, Plauth, Lopes & Baudisch, <i>Gesture output: Eyes-free output using a force feedback touch surface</i> , CHI 2013 Conference Paper |
| Immersion Ex. 2008 | ITC Claim Construction Order |
| Immersion Ex. 2009 | <i>Curriculum Vitae</i> of Nathan J. Delson, Ph.D. |

I. PRELIMINARY STATEMENT

Patent Owner Immersion Corporation (“Immersion” or “Patent Owner”) submits this Response to the Board’s Decision – Institution of *Inter Partes* Review (Paper 7) (“Institution Decision”) as requested by Apple, Inc. (“Petitioner”), entered January 11, 2017, of United States Patent No. 8,773,356 (“the '356 patent”).

Petitioner argues that Rosenberg 281’s single disclosure of a lookup table would have been obvious to combine with Rosenberg 737’s system. However, the decision of whether to implement a lookup table into a particular system is based on a complex series of factors that Petitioner’s expert admits he did not address. For example, Petitioner’s expert Dr. Baudisch admits that there are numerous alternatives to a lookup table that can be used to retrieving haptic effects. Dr. Baudisch only considered one such alternative in his declaration. Furthermore, Dr. Baudisch admits that there are many factors that a POSITA would consider in determining which approach to implement in any particular system. Dr. Baudisch only considered one of these many factors in his declaration. In fact, in designing his own haptic feedback system, Dr. Baudisch chose an approach different than a lookup table. Ex. 2005 at ¶¶ 61-62.

Petitioner cannot sustain its argument that implementation of the claimed

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