

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

In the Matter of:

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

Inv. No. 337-TA-990

**Immersion's Preliminary Proposed Claim Constructions and Notice Regarding Expert
Testimony for Claim Construction and/or Tutorial**

Pursuant to the Joint Discovery Statement and the procedural schedule in this investigation, Immersion hereby provides the following list of its preliminary proposed claim constructions for the terms identified in the April 28, 2016 Joint List of Claim Terms to Construe. Immersion reserves the right to modify this list, including by adding or dropping terms or by modifying its proposed claim construction of any term. Further, at present, Immersion intends to present expert testimony for claim construction and/or tutorial, including as may be appropriate to respond to expert testimony presented by other parties.

Patent	Asserted Claims	Term	Immersion's Preliminary Proposed Construction
U.S. Patent No. 8,773,356	1, 11, 12, 21, 22, 26	"lookup table"	"data structure containing associations between interactions and haptic effect data"
	1, 10, 12, 20, 22, 25	"haptic effect data"	"data identifying or describing a tactile sensation"
U.S. Patent No. 8,619,051	3, 9, 13	"digitized streamed envelope construct"	"file format containing a stream of control information (e.g., voltage levels) over time for the stored haptic effect, encoded as a sequence of bytes"

Patent	Asserted Claims	Term	Immersion's Preliminary Proposed Construction
	1, 8, 12	"the entire haptic output in response to the [haptic effect] request consists of the [first/requested pre-defined] stored haptic effect"	"the haptic output is created from a single stored haptic effect, rather than by assembling multiple effects"
	1, 5, 6, 8, 11, 12, 15	"stored haptic effect"	"haptic effect with pre-defined low-level haptic parameters such as voltage levels over time (e.g., a waveform)"
U.S. Patent No. 8,659,571	1, 4, 5, 6, 7, 12, 15, 16, 17, 18, 23, 26, 27, 28, 29	"dynamic interaction parameter"	"an interaction parameter that changes over time or reacts in real time"

Dated: June 3, 2016

Respectfully submitted,

/s/ Richard Birnholz

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

Barbara A. Murphy
David F. Nickel
Kandis C. Gibson
FOSTER, MURPHY, ALTMAN & NICKEL, PC
1899 L Street NW #1150
Washington, DC 20036
Telephone: (202) 822-4100

*Counsel for Complainant
Immersion Corporation*