UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

IMMERSION CORPORATION,
Patent Owner.

Case IPR2016-00896
Patent No. 8,659,571

DECLARATION OF YON VISELL, PH.D.

IN SUPPORT OF IMMERSION CORPORATION'S

PATENT OWNER PRELIMINARY RESPONSE

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1. I, Yon Visell, declare as follows:

I. INTRODUCTION

2. I have been engaged by Immersion Corporation ("Immersion") as an expert in connection with matters raised in the Petition for Inter Partes Review ("Petition") of U.S. Patent No. 8,659,571 (the "'571 patent") filed by Apple Inc. ("Apple" or "Petitioner").

3. This declaration is based on the information currently available to me. To the extent that additional information becomes available, I reserve the right to continue my investigation and study, which may include a review of documents and information that may be produced, as well as testimony from depositions that have not yet been taken.

II. SUMMARY OF OPINIONS

4. The '571 patent is entitled "Interactivity Model for Shared Feedback on Mobile Devices." The '571 patent is directed to a novel way of producing haptic effects in electronic devices. The fundamental insight that is described and claimed in the '571 patent is that the user's gesture interactions with the device need to be tracked and analyzed in order to properly synchronize haptic feedback with a user's input. Reflecting this focus, the claims specify that both a first ***and*** a second gesture signal (each based on a user's gestural inputs) are used to generate

something called a "dynamic interaction parameter." The petition challenges claims 1-7 and 23-29 of the '571 patent.

5. The petition raises three grounds, each based on obviousness under pre-AIA 35 U.S.C. § 103(a). Ground 1 argues that claims 1-4, 7, 23-26 and 29 of the '571 patent are obvious in light of U.S. Patent No. 7,952,566 ("Poupyrev"), Ex. 1013. Based on studying the petition and the exhibits cited in the petition as well as other documents, it is my opinion that claims 1-4, 7, 23-26 and 29 of the '571 patent are not rendered obvious by Poupyrev.

6. Ground 2 argues that claims 5 and 27 are obvious in light of Poupyrev and A FORCE FEEDBACK PROGRAMMING PRIMER by Louis Rosenberg ("Primer"), Ex. 1017. Based on studying the petition and the exhibits cited in the petition as well as other documents, it is my opinion that claims 5 and 27 are not rendered obvious by Poupyrev in view of Primer.

7. Ground 3 argues that claims 6 and 28 are obvious in light of Poupyrev and Canadian Patent App. No 2,059,893 A1 ("Tecot"), Ex. 1015. Based on studying the petition and the exhibits cited in the petition as well as other documents, it is my opinion that claims 6 and 28 are not rendered obvious by Poupyrev in view of Tecot.

8. Grounds 4 and 5 argue invalidity of claims 1-6 and 23-29 in view of U.S. Patent No. 5,734,373 ("Rosenberg '373," Ex. 1004) alone, or in combination

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