

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

APPLE INC.,  
Petitioner

v.

IMMERSION CORPORATION,  
Patent Owner

U.S. Patent No. 8,659,571

Filing Date: February 21, 2013

Issue Date: February 25, 2014

Title: Interactivity Model for Shared Feedback on Mobile Devices

---

*Inter Partes* Review No.: (Unassigned)

---

**PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,659,571  
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. §§ 42.1-100, ET SEQ.**

## TABLE OF CONTENTS

|      |   |    |
|------|---|----|
| I.   | COMPLIANCE WITH FORMAL REQUIREMENTS .....   | 1  |
| A.   | Mandatory Notices Under 37 C.F.R. §§ 42.8(b)(1)-(4) .....   | 1  |
| 1.   | Real Party-In-Interest.....   | 1  |
| 2.   | Related Matters .....   | 1  |
| 3.   | Lead and Backup Counsel .....   | 1  |
| 4.   | Service Information.....  | 2  |
| B.   | Proof of Service on the Patent Owner.....   | 2  |
| C.   | Power of Attorney .....   | 2  |
| D.   | Standing.....   | 2  |
| E.   | Fees.....   | 2  |
| II.  | STATEMENT OF PRECISE RELIEF REQUESTED .....   | 2  |
| III. | FULL STATEMENT OF REASONS FOR REQUESTED RELIEF .....  | 3  |
| A.   | Summary of the '571 Patent.....   | 3  |
| B.   | Person of Ordinary Skill in the Art .....   | 4  |
| C.   | Claim Construction .....  | 4  |
| 1.   | “gesture signal” .....  | 5  |
| 2.   | “dynamic interaction parameter” .....   | 5  |
| 3.   | “vector signal” .....   | 5  |
| 4.   | “on screen signal” .....  | 5  |
| 5.   | “generating a dynamic interaction parameter using... a<br>physical model” .....                                   | 5  |
| 6.   | “generating a dynamic interaction parameter using... an<br>animation” .....                                       | 6  |
| D.   | Ground 1: Claims 1-4, 7, 23-26 and 29 are Obvious Under 35<br>U.S.C. § 103(a) (pre-AIA) in View of Poupyrev ..... | 6  |
| 1.   | Limitation 1.pre: “A method of producing a haptic effect<br>comprising:” .....                                    | 9  |
| 2.   | Claim 2: “The method of claim 1 wherein the first or<br>second gesture signal comprises a vector signal.” .....   | 23 |

Table of Contents  
(continued)

|     |  | Page |
|-----|--|------|
| 3.  | Claim 3: “The method of claim 1 wherein the first or second gesture signal comprises an on-screen signal.” .....   | 25   |
| 4.  | Claim 4: “The method of claim 1 wherein generating a dynamic interaction parameter comprises generating a dynamic interaction parameter from a difference between the first gesture signal and the second gesture signal.” .....   | 25   |
| 5.  | Claim 7: “The method of claim 1 further comprising: receiving a first device sensor signal; receiving a second device sensor signal; and wherein generating a dynamic interaction parameter comprises generating a dynamic interaction parameter using the first gesture signal and the second gesture signal and the first device sensor signal and the second device sensor signal.” ..... | 26   |
| 6.  | Claim 23.pre: “A non-transitory computer readable medium having instructions stored thereon that, when executed by a processor, causes the processor to produce a haptic effect, the instructions comprising:” .....   | 30   |
| 7.  | Claim 23.a: “receiving a first gesture signal;” .....  | 31   |
| 8.  | Claim 23.b: “receiving a second gesture signal;” .....   | 31   |
| 9.  | Claim 23.c: “generating a dynamic interaction parameter using the first gesture signal and the second gesture signal; and” .....   | 31   |
| 10. | Claim 23.d: “applying a drive signal to a haptic output device according to the dynamic interaction parameter.” .....  | 31   |
| E.  | Ground 2: Claims 5 and 27 Are Obvious Under 35 U.S.C. § 103(a) (pre-AIA) in View of Poupyrev and Primer .....  | 31   |
| 1.  | Claim 5: “The method of claim 1 wherein generating a dynamic interaction parameter comprises generating a dynamic interaction parameter using the first gesture signal and the second gesture signal and a physical model.” .....  | 31   |
| 2.  | Claim 27 .....   | 34   |

Table of Contents  
(continued)

|  | Page |
|--|------|
| F. Ground 3: Claims 6 and 28 Are Obvious Under 35 U.S.C. § 103(a) (pre-AIA) in View of Poupyrev and Tecot.....   | 34   |
| 1. Claim 6: “The method of claim 1 wherein generating a dynamic interaction parameter comprises generating a dynamic interaction parameter using the first gesture signal and the second gesture signal and an animation.”.....      | 34   |
| 2. Claim 28.....   | 39   |
| G. Ground 4: Claims 1, 2, 4-6, 23, 24, and 26-29 are Obvious Under 35 U.S.C. § 103(a) (pre-AIA) in Light of Rosenberg ’373.....  | 39   |
| 1. Limitation 1.pre: “A method of producing a haptic effect comprising:” .....   | 42   |
| 2. Claim 2: “The method of claim 1 wherein the first or second gesture signal comprises a vector signal.” .....  | 55   |
| 3. Claim 4: “The method of claim 1 wherein generating a dynamic interaction parameter comprises generating a dynamic interaction parameter from a difference between the first gesture signal and the second gesture signal.” .....  | 57   |
| 4. Claim 5: “The method of claim 1 wherein generating a dynamic interaction parameter comprises generating a dynamic interaction parameter using the first gesture signal and the second gesture signal and a physical model.” ..... | 58   |
| 5. Claim 6: “The method of claim 1 wherein generating a dynamic interaction parameter comprises generating a dynamic interaction parameter using the first gesture signal and the second gesture signal and an animation.”.....      | 59   |
| 6. Limitation 7.a: “The method of claim 1 further comprising: receiving a first device sensor signal;” .....   | 61   |
| H. Ground 5: Claims 3 and 25 Are Obvious Under 35 U.S.C. § 103(a) (pre-AIA) in Light of Rosenberg ’373 and Rosenberg ’846.....   | 67   |

Table of Contents  
(continued)

|   | Page |
|---|------|
| 1. Claim 3: “The method of claim 1 wherein the first or second gesture signal comprises an on-screen signal.” ..... | 68   |
| 2. Claim 25 .....   | 70   |
| I. This Petition Is Proper Under 35 U.S.C. § 325(d) .....   | 70   |
| IV. CONCLUSION.....   | 70   |

# 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.