

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

**Before The Honorable Charles E. Bullock
Chief Administrative Law Judge**

In the Matter of

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

Investigation No. 337-TA-990

RESPONDENTS' JOINT NOTICE OF PRIOR ART

Pursuant to the Procedural Schedule set forth in Order No. 6 and Ground Rule No. 5, Respondents Apple Inc. and AT&T Mobility LLC (collectively, "Respondents"), by the undersigned attorneys, respectfully submit this Notice of Prior Art.

Respondents may rely on the prior art set forth in Exhibit A, hereto, either singly or in any combination, to establish the invalidity or unenforceability of the asserted claims of U.S. Patent Nos. 8,619,051, 8,659,571, and 8,773,356 (together, "the Patents-in-Suit"), or to demonstrate the relevant state of the art or level of skill in the art. All art identified for U.S. Patent No. 8,773,356 also is art to U.S. Patent Nos. 8,619,051 and 8,659,571, and all art for U.S. Patent No. 8,619,051 also is art to U.S. Patent No. 8,659,571. Additionally, Respondents may rely upon prior art (1) referenced in the Patents-in-Suit, their prosecution histories, or the references cited in this Notice, (2) identified or produced by Complainant, Respondents, or third parties, (3) included on any parties' hearing exhibit lists, (4) contained within any patent prosecution history that relates to the Patents-in-Suit, including parent applications, child applications and foreign counterparts to the

Patents-in-Suit, or cited in any expert report served during this Investigation, or (5) identified during the remainder of discovery. With respect to the foregoing prior art references, Respondents also reserve the right to rely on any prior invention and commercial embodiments that a reasonable opportunity for discovery shows are prior art under 35 U.S.C. § 102 as anticipatory prior art, as rendering any asserted missing element obvious, or as evidence of the ordinary level of skill in the art. Respondents further reserve the right to rely on technical dictionaries and treatises as rendering any asserted missing element inherent, obvious, or as evidence of the ordinary level of skill in the art.

Respondents reserve the right to supplement or amend this Notice to address any new or modified infringement contentions asserted by Complainant, to rebut any contentions regarding the prior art or Respondents' invalidity or unenforceability positions, or to the extent that additional prior art is identified during the course of this Investigation. Respondents further reserve all rights to supplement or amend this notice as discovery proceeds, including third-party discovery and discovery arising from Complainant's supplementation of its responses to discovery requests, including completing production of all relevant, responsive, non-privileged documents in its possession custody or control identifying prior art and prior art leads.

Date: May 25, 2016

Respectfully submitted,

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A. '051 Patent

Prior Art Patents and Patent Applications			
Patent No.	Title	Patentee(s)	Date
U.S. Patent No. 4,566,001	Touch Strip for Display Terminal	Moore, et al.	01/21/1986
U.S. Patent No. 4,649,499	Touchscreen Two-Dimensional Emulation of Three-Dimensional Objects	Sutton, et al.	03/10/1987
U.S. Patent No. 4,667,182	Stylus or Pen with Tactile Response to User	Murphy	05/19/1987
U.S. Patent No. 5,038,089	Synchronized Computational Architecture for Generalized Bilateral Control of Robot Arms	Szakaly	08/06/1991
U.S. Patent No. 5,347,295	Control of a Computer Through a Position-Sensed Stylus	Agulnick, et al.	09/13/1994
U.S. Patent No. 5,347,477	Pen-Based Form Computer	Lee	09/13/1994
U.S. Patent No. 5,482,051	Electromyographic Virtual Reality System	Reddy, et al.	01/09/1996
U.S. Patent No. 5,526,422	System and Method for Cleaning the Display Screen of a Touch Screen Device	Keen	06/11/1996
U.S. Patent No. 5,615,384	Personal Communicator Having Improved Zoom and Pan Functions for Editing Information on Touch Sensitive Display	Allard, et al.	03/25/1997
U.S. Patent No. 5,623,589	Method and Apparatus for Incrementally Browsing Levels of Stories	Needham, et al.	04/22/1997
U.S. Patent No. 5,710,844	Method for Searching and Displaying Results in a Pen-Based Computer System	Capps, et al.	01/20/1998
U.S. Patent No. 5,731,979	Map Information Display Apparatus for Vehicle	Yano, et al.	03/24/1998
U.S. Patent No. 5,734,373	Method and Apparatus for Controlling Force Feedback Interface Systems Utilizing a Host Computer	Rosenberg, et al.	03/31/1998
U.S. Patent No. 5,742,278	Force Feedback Joystick with Digital Signal Processor Controlled by Host Processor	Chen, et al.	04/21/1998
U.S. Patent No. 5,742,279	Input/Display Integrated Information Processing Device	Yamamoto, et al.	04/21/1998
U.S. Patent No. 5,748,185	Touchpad with Scroll and Pan Regions	Stephan, et al.	05/05/1998
U.S. Patent No. 5,754,096	Electronic Apparatus With Vibration Informing Function	Muto et al.	05/19/1998
U.S. Patent No. 5,825,308	Force Feedback Interface Having Isotonic and Isometric Functionality	Rosenberg	10/20/1998
U.S. Patent No. 5,844,392	Haptic Browsing	Peurach, et al.	12/01/1998

Prior Art Patents and Patent Applications			
Patent No.	Title	Patentee(s)	Date
U.S. Patent No. 5,889,236	Pressure Sensitive Scrollbar Feature	Gillespie, et al.	03/30/1999
U.S. Patent No. 5,889,672	Tactiley Responsive User Interface Device and Method Therefor	Schuler et al.	03/30/1999
U.S. Patent No. 5,892,475	User Interface for an Electronic Device	Palatsi	04/06/1999
U.S. Patent No. 5,959,613	Method and Apparatus for Shaping Force Signals for a Force Feedback Device	Rosenberg et al.	09/28/1999
U.S. Patent No. 5,984,880	Tactile Feedback Controlled by Various Medium	Lander, et al.	11/16/1999
U.S. Patent No. 5,999,168	Haptic Accelerator for Force Feedback Computer Peripherals	Rosenberg, et al.	12/07/1999
U.S. Patent No. 6,009,338	Mobile Information Terminal Equipment and Portable Electronic Apparatus	Iwata, et al.	12/28/1999
U.S. Patent No. 6,071,194	Reconfigurable Video Game Controller	Sanderson, et al.	06/06/2000
U.S. Patent No. 6,078,308	Graphical Click Surfaces for Force Feedback Applications to Provide User Selection Using Cursor Interaction with a Trigger Position within a Boundary of a Graphical Object	Rosenberg et al.	06/20/2000
U.S. Patent No. 6,088,019	Low Cost Force Feedback Device with Actuator for Non-Primary Axis	Rosenberg	07/11/2000
U.S. Patent No. 6,118,435	Display Unit with Touch Panel	Fujita, et al.	09/12/2000
U.S. Patent No. 6,121,970	Method and System for HTML-Driven Interactive Image Client	Guedalia	09/19/2000
U.S. Patent No. 6,125,385	Force Feedback Implementation in Web Pages	Wies, et al.	09/26/2000
U.S. Patent No. 6,131,047	Radiotelephones having Contat-Sensitive User Interfaces and Methods of Operating Same	Hayes, Jr., et al.	10/10/2000
U.S. Patent No. 6,131,097	Haptic Authoring	Peurach, et al.	10/10/2000
U.S. Patent No. 6,137,468	Method and Apparatus for Altering a Display in Response to Changes in Attitude Relative to a Plane	Martinez, et al.	10/24/2000
U.S. Patent No. 6,147,674	Method and Apparatus for Designing Force Sensations in Force Feedback Computer Applications	Rosenberg et al.	11/14/2000
U.S. Patent No. 6,147,675	Input Device for Transmitting an Input Signal to Computer Game Port	Liu	11/14/00

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