

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. 8,749,507
Filing Date: April 6, 2012
Issue Date: June 10, 2014

Title: Systems And Methods For Adaptive Interpretation Of
Input From A Touch-Sensitive Input Device

Inter Partes Review No.: (Unassigned)

**PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,749,507
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. §§ 42.1-100, ET SEQ.**

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EXHIBIT LIST

Exhibit No.	Description
1101	U.S. Patent No. 8,749,507 (the “’507 patent”).
1102	File history of U.S. Patent No. 8,749,507.
1103	U.S. Patent No. 6,590,568 to Astala (“Astala”).
1104	U.S. Pat. App. Pub. No. 2002/0033795 to Shahoian (“Shahoian”).
1105	Patent Owner Immersion’s claim chart regarding alleged infringement of the ’507 patent by certain Apple iPhone products (Exhibit 20 to Immersion’s complaint in ITC Investigation No. 337-TA-1004).
1106	Patent Owner Immersion’s preliminary proposed claim constructions in ITC Investigation No. 337-TA-1004.
1107	Claim construction order from ITC Inv. Nos. 337-TA-990 and -1004 (consolidated).
1108	U.S. Patent No. 5,488,204 to Mead (“Mead”).
1109	U.S. Patent No. 5,734,373 to Rosenberg (“Rosenberg”).
1110	Declaration of expert Dr. Andy Cockburn (“Cockburn Decl.”).

I. INTRODUCTION

The claims of Immersion’s U.S. Patent No. 8,749,507 (the “’507 patent”) challenged in this Petition are invalid over the prior art. During prosecution of the ’507 patent, Immersion overcame multiple rejections of the claims by adding limitations reciting various criteria used to detect the occurrence of a gesture on a pressure-sensitive device. This gesture detection algorithm, however, was known in the art, and is disclosed by the Astala prior art reference discussed below. Additional limitations of the challenged claims are disclosed by Shahoian, a prior art Immersion patent application publication that discusses at length providing haptic feedback in response to detecting a gesture.

II. COMPLIANCE WITH FORMAL REQUIREMENTS

A. Mandatory Notices Under 37 C.F.R. §§ 42.8(b)(1)-(4)

1. Real Party-In-Interest

Apple is the real party-in-interest.

2. Related Matters

The ’507 patent is subject to the following actions: 1) *Certain Mobile and Portable Electronic Devices Incorporating Haptics (Including Smartphones and Laptops) and Components Thereof*, Inv. Nos. 337-TA-990 and -1004 (consolidated); 2) *Immersion Corp. v. Apple Inc., et al.*, Nos. 1:16-cv-00077 and 1:16-cv-00325 (D. Del.); and 3) *Apple Inc., v. Immersion Corp.*, IPR2016-01777.

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