Patent Owner's Preliminary Response IPR2024-00556 (U.S. Patent No. 8,749,507)

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
VALVE CORPORATION, Petitioner,
v.
IMMERSION CORPORATION, Patent Owner.
Case IPR2024-00556 U.S. Patent No. 9,748,507

PATENT OWNER'S PRELIMINARY RESPONSE UNDER 35 U.S.C. §§ 311-19 AND 37 C.F.R. § 41.100, ET SEQ.



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VI.	ASTALA + SHAHOIAN DOES NOT DISCLOSE OR SUGGEST USING PRESSURE, CHANGE IN PRESSURE AND ELASPED TIME TO "DETERMINE A PRESS"				
	A.	Astala + Shahoian does not teach determining an initial press of the touch sensitive input device as required by the claim language "determining a press".	24		
	В.	Astala + Shahoian does not use a "change in pressure" to determine an initial press	27		
VII. NEITHER KEELY NOR KOLMYKOV-Z TEACH "DETERMIN[ING] A PRESS" PRESSURE THRESHOLD" AND TH		THER KEELY NOR KOLMYKOV-ZOTOV DISCLOSE OR CH "DETERMIN[ING] A PRESS" OR "A CHANGE IN SSURE THRESHOLD" AND THEREFORE DO NOT DER THE CLAIMS UNPATENTABLE	35		
	A.	Keely and Kolmykov-Zotov do not teach "determining a press" as required by all challenged claims, but rather describe identifying gestures that simulate mouse inputs.	35		
	В.	The Petition does not identify evidence relating to "determining a press" in the first instance but rather whether a the "hold" portion of a press-and-hold event has occured	37		



VIII.	INSTITUTION SHOULD BE DENIED UNDER 35 U.S.C. § 314(a)			
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35 U.S.C. § 314(a)42
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EXHIBIT LIST

Exhibit No.	Exhibit Description
2001	Declaration of Craig Rosenberg, Ph.D. in Support of Immersion Corporation's Patent Owner Preliminary Response, dated May
	15, 2024
2002	Curriculum Vitae of Craig Rosenberg, Ph.D.
2003	File History of U.S. Patent SN 10/723,778
2004	Immersion Corp. v. Valve Corp., 2:23-cv-000712-TL, Order on Motion to Stay Pending Inter Partes Review, Dkt. # 69
2005	Immersion Corp. v. Valve Corp., 2:23-cv-000712-TL, Case Scheduling Order, Dkt. # 46
2006	Immersion Corp. v. Valve Corp., 2:23-cv-000712-TL, Valve Corp.'s Invalidity Contentions



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