IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

IMMERSION CORPORATION, Plaintiff, v. META PLATFORMS, INC. f/k/a FACEBOOK, INC., Defendant	))))))))))))	Case No. 6:22-cv-00541-ADA **JURY TRIAL DEMANDED**

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Scheduling Order (Dkt. No. 28) and the Standing Order Governing Proceedings (OGP) 4.2—Patent Cases, Plaintiff Immersion Corporation ("Immersion") and Defendant Meta Platforms, Inc. ("Meta") submit this Joint Claim Construction Statement.

DISPUTED CLAIM TERMS

#	Claim(s)	Term	Immersion	Meta	Id'd by
1	'806 Patent: 11, 12, 15	"control gesture"	Plain and ordinary meaning To the extent the Court believes that any further construction is necessary, the term may include "a user manipulation having separate portions that must be performed in a specific order and/or with a specific timing"	"a gesture made by a user that is a single and discrete control input having separate portions. The separate portions must be performed in specific order and/or with a specific timing to effectively achieve the control input associated with the 'control gesture.' Performance of the separate portions, on their own, will not result in the control input associated with the 'control gesture' as a whole (e.g., a 'control gesture' is not merely a combination of other	Meta

				gestures, each associated with its own control input)"	
2	'524 Patent: 1, 11	"confirmation haptic effect"	Plain and ordinary meaning To the extent the Court believes that any further construction is necessary, the plain and ordinary meaning includes "one of multiple possible tactile feedback events for a single user interface element, customized based on context metadata, to confirm the interaction with the user interface element"	"a haptic effect used to confirm the interaction with the user interface element"	Meta
3	'524 Patent: 1, 6, 11, 13	"context metadata"	Plain and ordinary meaning	"any data associated with an interaction with the user interface element"	Meta
4	'524 Patent: 1, 2, 3, 7, 11, 12, 14	"haptic parameter"	Plain and ordinary meaning	"a quantity of a haptic effect quality, such as magnitude, frequency, duration, amplitude (i.e., strength), waveform, or any other kind of quantifiable haptic parameter"	Meta
5	'217 Patent, claim 1; '143 Patent, claims 1, 8, 15	"real space"	Plain and ordinary meaning To the extent the Court believes that any further construction is necessary, the plain and ordinary meaning includes "the three-dimensional real world user surroundings"	"a three-dimensional area in the real world"	Meta
6	'298 Patent, claims 1, 9, 17	"free space"	Plain and ordinary meaning To the extent the Court believes that any further	"a three-dimensional area in the real world"	Meta

			construction is necessary, the plain and ordinary meaning includes "the three-dimensional real world user surroundings"		
7	'222 Patent: 10	"augmented reality"	Plain and ordinary meaning To the extent the Court believes that any further construction is necessary, the plain and ordinary meaning includes "an environment comprising a physical space of one or more physical objects and a virtual space of one or more virtual objects that are displayed coincident with or in association with one or more physical objects in the physical space"	"one or more physical objects in a real-world, physical space are concurrently displayed with one or more virtual objects in a virtual space"	Meta
8	'222 Patent: 15	"chain"	"claim"	(undisputed)	Immersion

Date: January 21, 2023

Respectfully submitted,

/s/*Stefan Szpajda*

Stefan Szpajda, WA Bar No. 50106
Cristofer I. Leffler, WA Bar No. 35020
David Schumann, CA Bar No. 223936
C. Maclain Wells, CA Bar No. 221609
Sam Kim, CA Bar No. 282582
Alexandra Fellowes, NY Bar No. 5015946
Palani P. Rathinasamy, CA Bar No. 269852
Cliff Win, Jr., CA Bar No. 270517
Folio Law Group PLLC
1200 Westlake Ave. N., Suite 809
Seattle, WA 98109
Tel: (206) 880-1802
Email:
stefan@foliolaw.com
cris.leffler@foliolaw.com
david.schumann@foliolaw.com
maclain@foliolaw.com
sam.kim@foliolaw.com
alexandra.fellowes@foliolaw.com
palani@foliolaw.com
cliff.win@foliolaw.com

Joseph M. Abraham, TX Bar No. 24088879
Timothy F. Dewberry, TX Bar No. 24090074
Folio Law Group PLLC
13492 Research Blvd., Suite 120, No. 177
Austin, TX 78750
Tel: (737) 234-0201
Email: joseph.abraham@foliolaw.com
timothy.dewberry@foliolaw.com

Attorneys for Immersion Corporation

CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ *Stefan Szpajda*
Stefan Szpajda