

Paper No. ____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VALVE CORPORATION,
Petitioner,

v.

IMMERSION CORPORATION,
Patent Owner.

Case No. IPR2024-00478
Patent No. 9,430,042

**PETITIONER’S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION OF NATHAN R. SPEED**

LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 9,430,042
1002	Prosecution History of U.S. Patent No. 9,430,042
1003	Declaration of Jean Renard Ward
1004	CV of Jean Renard Ward
1005	U.S. Provisional Application No. 60/877,333
1006	European Patent No. 2126667
1007	U.S. Patent No. 6,636,197
1008	U.S. Patent Application Publication No. US 2006/0038781
1009	U.S. Patent No. 6,429,846
1010	U.S. Patent No. 5,734,373
1011	U.S. Patent No. 6,243,078
1012	U.S. Patent Application Publication No. US 2006/0119573
1013	U.S. Patent No. 5,977,867
1014	U.S. Patent No. 6,128,006
1015	U.S. Patent No. 6,819,990
1016	U.S. Patent No. 6,686,911
1017	U.S. Patent No. 6,917,867
1018	U.S. Patent Application Publication No. US 2007/0222765
1019	Plaintiff's Preliminary Infringement Contentions, <i>Immersion Corp. v. Valve Corp.</i> , 2:23-cv-00712 (W.D. Wash.) (served Oct. 20, 2023)
1020	Amended Joint Status Report and Discovery Plan, <i>Immersion Corp. v. Valve Corp.</i> , 2:23-cv-00712, Dkt No. 45 (W.D. Wash) (filed Nov. 2, 2023)

1021	Exhibit C to Plaintiff’s Preliminary Infringement Contentions, <i>Immersion Corp. v. Valve Corp.</i> , 2:23-cv-00712 (W.D. Wash.) (served Oct. 20, 2023)
1022	International Application Publication Number WO 02/102616
1023	U.S. Patent Application Publication No. US 2006/0047386
1024	U.S. Patent Application Publication No. US 2007/0120830
1025	U.S. Patent No. 6,157,372
1026	U.S. Patent No. 6,418,362
1027	International Application Publication Number WO 97/25821
1028	International Application Publication Number WO 00/65553
1029	Negroponte, “HUNCH An Experiment in Sketch Recognition” in UCLA, Environmental Design: Research and Practice, Proceedings of the EDRA 3/ar 8 Conference (1972)
1030	Foley, “Fundamentals of Interactive Computer Graphics” (1982) (excerpts)
1031	Buxton, “There’s More to Interaction than Meets the Eye” in Norman, ed., User Centered Systems Design (1986)
1032	Rosch, “Alternative Input--Digitizing Tablets-Pointing the Way to Easier Input,” PC Magazine p. 227 (Nov. 28, 1989)
1033	U.S. Patent No. 5,491,495
1034	Buxton, “Issues and Techniques in Touch-Sensitive Tablet Input,” SIGGRAPH ‘85, 19:3, 215 (1985)
1035	U.S. Patent No. 4,202,041
1036	Evans, “Tablet-Based Valuator That Provide One, Two, or Three Degrees of Freedom,” Computer Graphics, 15:3 (Aug. 1981)
1037	U.S. Patent No. 5,903,229
1038	U.S. Patent Application Publication No. 2006/0291666A1
1039	International Application Publication Number WO 2006/020305
1040	U.S. Patent Application Publication No. 2007/0222765A1
1041	U.S. Patent No. 494,562

1042	Davis, “The RAND Tablet: A Man-Machine Graphical Communication Device” in Proceedings-Fall Joint Computer Conference (1964)
1043	U.S. Patent No. 3,482,241
1044	U.S. Patent No. 5,708,460
1045	U.S. Patent No. 6,492,979
1046	U.S. Patent No. 5,510,813
1047	Buxton, “Touch Gesture and Marking,” ch. 7 in Baecker, ed., Readings in Human-Computer Interaction (1995)
1048	U.S. Patent No. 6,160,489
1049	Strong, “An Electrotactile Display,” IEEE, Trans. On Man-Machine Sys., mms-11:1 (Mar. 1970)
1050	Massie, “Initial Haptic Explorations with the Phantom: Virtual Touch Through Point Interaction” MIT Thesis (1996)
1051	Bliss, “Optical-to-Tactile Image Conversion for the Blind,” IEEE, Trans. On Man-Machine Sys., mms-11:1 (Mar. 1970)
1052	European Patent Publication No. EP0265011A1
1053	U.S. Patent No. 5,388,992
1054	IBM, “Mouse Ball-Actuating Device with Force and Tactile Feedback,” IBM Technical Disclosure Bulletin 32:9B (Feb. 1990)
1055	Fukumoto, “Active Click Tactile Feedback for Touch Panels,” CHI 2001 Interactive Posters (2001)
1056	International Application Publication Number WO 92/00559A1
1057	U.S. Patent Application Publication No. 2006/0241864A1
1058	U.S. Patent No. 5,782,639
1059	U.S. Patent Application Publication No. 2006/0049010
1060	International Application Publication Number WO 2004/042693
1061	U.S. Patent Appl. No. 2003/0030619
1062	U.S. Patent No. 6,424,333
1063	European Application Publication No. EP 0799597A1

1064	U.S. Patent No. 5,719,561
1065	U.S. Patent No. 5,973,441
1066	Minsky, “Computational Haptics” MIT Thesis (1995)
1067	U.S. Patent No. 5,451,924
1068	Patrick, “Design Construction and Testing of a Fingertip Tactile Display for Interaction with Virtual and Remote Environments,” MIT Thesis (1990)
1069	Massie, “The Phantom Haptic Interface—A Device for Probing Virtual Objects” in ASME, Dynamic Systems and Control (1994)
1070	U.S. Patent No. 5,982,352
1071	U.S. Patent No. 6,131,097
1072	U.S. Patent No. 6,337,678
1073	U.S. Patent No. 6,219,034
1074	U.S. Patent No. 6,219,032
1075	U.S. Patent No. 4,885,565
1076	U.S. Patent No. 6,031,518
1077	U.S. Patent No. 7,084,859
1078	U.S. Patent No. 6,848,263
1079	U.S. Patent No. 6,275,231
1080	West, “Developing High Quality Data Models,” EPISTLE (1996)
1081	U.S. Patent Application Publication No. 2003/0122779
1082	Leonard, “Windows XP Hacks and Mods For Dummies” (2005)
1083	Federal Court Management Statistics (September 2023)
1084	<i>Immersion Corp. v. Valve Corp.</i> , 2:23-cv-00712, Dkt. No. 15 (Proof of Service) (May 18, 2023)
1085	Declaration of Nathan R. Speed in Support of Motion for Admission <i>Pro Hac Vice</i>

I. STATEMENT OF PRECISE RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c) and Paper No. 3, Petitioner Valve Corporation respectfully requests that the Board admit Nathan R. Speed *pro hac vice* in this proceeding, IPR2024-00478. Petitioner is concurrently seeking admission of Mr. Speed *pro hac vice* in related proceeding IPR2024-00477. Patent Owner has been consulted and has indicated it does not object to Mr. Speed being admitted *pro hac vice* in this proceeding.

II. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO RECOGNIZE COUNSEL PRO HAC VICE DURING THE PROCEEDING

37 C.F.R. § 42.10(c) provides:

The Board may recognize counsel *pro hac vice* during a proceeding upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose. For example, where the lead counsel is a registered practitioner, a motion to appear *pro hac vice* by counsel who is not a registered practitioner may be granted upon a showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.

The facts here establish good cause for the Board to recognize Mr. Speed *pro hac vice* in this proceeding.

First, as set forth in Mr. Speed's declaration (Ex. 1085), Mr. Speed has an established familiarity with the subject matter at issue in these proceedings. He has worked on preparing and reviewing the materials submitted in this proceeding.

Second, Mr. Speed has extensive patent litigation experience and is expected to use his experience to support Lead Counsel during the proceeding, including during depositions. Good cause exists to have Petitioner appoint as counsel Mr. Speed, as a litigator, to assist Lead Counsel.

Furthermore, as set forth in his declaration, Mr. Speed attests to all of the representations set forth in part 2(b) of Paper No. 7 from *Unified Patents v. Parallel Iron*, Case IPR2013-00639 (PTAB Oct. 15, 2013).

III. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board admit Nathan R. Speed *pro hac vice* in this proceeding.

Respectfully submitted,
Valve Corporation

Date: May 21, 2024

/ Richard Giunta/
Richard F. Giunta, Reg. No. 36,149
Andrew R. Varrenti, Reg. No. 78,555
WOLF, GREENFIELD & SACKS, P.C.
600 Atlantic Avenue
Boston, MA 02210
(617) 646-8000 Phone
(617) 646-8646 Fax

CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (E)(4)

I certify that on May 21, 2024, I will cause a copy of the foregoing document, including any exhibits filed therewith, to be served via electronic mail, as previously consented to by Patent Owner, upon the following:

David D. Schumann
Palani P. Rathinasamy
Moses Xie
Timothy Dewberry

david.schumann@foliolaw.com
palani@foliolaw.com
moses.xie@foliolaw.com
timothy.dewberry@foliolaw.com

Date: May 21, 2024

/MacAulay Rush/
MacAulay Rush
Paralegal
WOLF, GREENFIELD & SACKS, P.C.