

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VALVE CORPORATION,
Petitioner

v.

IMMERSION CORPORATION,
Patent Owner

Case No. IPR2024-00557
Patent No. 10,665,067

**PETITIONER'S IDENTIFICATION OF NEW ARGUMENTS
IN PATENT OWNER'S SUR-REPLY**

Pursuant to the Board’s April 9, 2025 authorizing email to the parties, Petitioner Valve Corp. (“Valve”) submits this identification of new arguments improperly raised for the first time in the Sur-Reply of Patent Owner Immersion Corp. (“Immersion”).

The only argument Immersion’s Patent Owner Response advanced against Ground 2’s showing for claim 1 was that the prior-art Meglan reference does not “*determine a haptic effect based in part on data from*” a sensor that tracks a position of the “*proxy object*” as allegedly required by limitations [1C] and [1D2]. *See* Paper No. 12 at 27-34; *see also* EX2003 at ¶¶77-88 (advancing same argument).

Immersion’s Sur-Reply newly argues that Ground 2’s showing for claim 1 fails because Meglan allegedly does not disclose a “*proxy object*” as required by limitation [1A]. *See, e.g.,* Paper No. 17 (“Sur-Reply”) at 20-23. The arguments made in the following sections of Immersion’s Sur-Reply are advanced to support Immersion’s new “*proxy object*” argument and are improper:

- Section IV.A.2: “The substrate does not have visual overlays.” (Sur-Reply at 17-19);
- Section IV.A.3: “The surrogate does not comprise the substrate.” (Sur-Reply at 19-20);
- Section IV.B: “Meglan Does Not Disclose the Claimed “Proxy Object” (Sur-Reply at 20-23), including:

- Section IV.B.1: “The surrogate is not a ‘proxy object.’” (Sur-Reply at 20-21);
- Section IV.B.2: “The substrate is not a ‘proxy object.’” (Sur-Reply at 21); and
- Section IV.B.3: “The surrogate and substrate together are not a ‘proxy object.’” (Sur-Reply at 21-23).

In addition to being advanced to support a new argument not advanced in the Patent Owner Response, the above-identified sections do not cite to or respond to any argument raised in Valve’s Reply.

Respectfully submitted,

Date: April 15, 2025

/ Nathan R. Speed /

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

I certify that on April 15, 2025, a copy of the foregoing document, including any exhibits filed therewith, is being served via electronic mail, as previously consented to by Patent Owner, upon the following:

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