

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VALVE CORPORATION,
Petitioner,

v.

IMMERSION CORPORATION,
Patent Owner.

Case No. IPR2024-00582
Patent No. 11,175,738

**PETITIONER’S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION OF CHARLES T. STEENBURG**

LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 11,175,738
1002	Prosecution History of U.S. Patent No. 11,175,738
1003	Prosecution History of European Counterpart to U.S. Patent No. 11,175,738
1004	Declaration of Dr. Gregory Welch (“Welch”)
1005	CV of Dr. Gregory Welch
1006	U.S. Patent Application Publication 2012/0249474A1 (“Pratt”)
1007	U.S. Provisional Patent Application No. 61/470,764 <i>(incorporated by reference in Pratt)</i>
1008	U.S. Patent No. 8,531,319 (“Ku”)
1009	U.S. Patent Application Publication 2013/0147728 (“Lee”)
1010	U.S. Patent Application Publication 2015/0061703 (“Jiang”)
1011	U.S. Patent Application Publication 2014/0139329 (“Ramstein”) <i>(incorporated by reference in Jiang)</i>
1012	U.S. Patent No. US 8,970,513 (“Kwon”)
1013	Exhibit G to Immersion’s Preliminary Infringement Contentions
1014	EP 2141580A2 (Ku’s European Counterpart)
1015	U.S. Patent Application Publication 2010/0004033 (“Choe”)
1016	U.S. Patent Application Publication 2008/0024459 (“Poupyrev”)
1017	U.S. Patent Application Publication 2018/0356891 (“Murakami”)
1018	U.S. Patent Application Publication 2011/0007021 (“Bernstein”)
1019	U.S. Patent No. 9,069,417 (“Rimon”)
1020	U.S. Patent Application Publication 2005/0134561 (“Tierling”)
1021	U.S. Patent Application Publication 2017/0300166 (“Rosenberg ’166”)
1022	U.S. Patent Application Publication 2017/0285848 (“Rosenberg ’848”)

Exhibit	Description
1023	U.S. Patent Application Publication 2009/0106655 (“Grant”)
1024	U.S. Patent Application Publication 2011/0102162 (“Gregorio”)
1025	U.S. Patent No. 7,902,474 (“Mittleman”)
1026	New Oxford American Dictionary, Third Edition (2010), definition of “pressure”
1027	American Heritage Dictionary of the English Language, Fifth Edition (2011), definition of “pressure”
1028	U.S. Patent Application Publication No. 2012/0143182 (“Ullrich”)
1029	McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Edition (2002), definition of “signal”
1030	Federal Court Management Statistics (September 2023)
1031	<i>Immersion Corp. v. Valve Corp.</i> , 2:23-cv-00712, Dkt. No. 46 (Order Setting Jury Trial Date) (May 18, 2023)
1032	Plaintiff’s Preliminary Infringement Contentions, <i>Immersion Corp. v. Valve Corp.</i> , 2:23-cv-00712 (W.D. Wash.) (served Oct. 20, 2023)
1033	<i>Immersion Corp. v. Valve Corp.</i> , 2:23-cv-00712, Dkt. No. 15 (Proof of Service) (May 18, 2023)
1034	Declaration of Nathan R. Speed in Support of Motion for Admission <i>Pro Hac Vice</i>
1035	Declaration of Charles T. Steenburg 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. 5, Petitioner Valve Corporation respectfully requests that the Board admit Charles T. Steenburg *pro hac vice* in this proceeding, IPR2024-00582. Patent Owner has been consulted and does not object to Mr. Steenburg 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. Steenburg *pro hac vice* in this proceeding.

First, as set forth in Mr. Steenburg's declaration (Ex. 1035), Mr. Steenburg 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. Steenburg 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. Steenburg, as a litigator, to assist Lead Counsel.

Furthermore, as set forth in his declaration, Mr. Steenburg 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 Charles T. Steenburg *pro hac vice* in this proceeding.

Respectfully submitted,
Valve Corporation

Date: July 22, 2024

/Elisabeth Hunt/

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

I certify that on July 22, 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:

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Palani P. Rathinasamy
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/MacAulay Rush/
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