Hon. Tana Lin

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

AMERICAN GNC CORPORATION;

Plaintiff,

v.

NINTENDO CO., LTD., and NINTENDO OF AMERICA INC.;

.

Case No. 2:23-cv-00302-TL

JOINT CLAIM CHART AND PREHEARING STATEMENT

Pursuant to Local Patent Rule 132, the Court's Standing Order for Patent Cases, Section D, and the Court's Scheduling Order (*see* Dkt. 36), Plaintiff American GNC Corp. ("American GNC") and Defendants Nintendo Co., Ltd. and Nintendo of America Inc. ("Nintendo") submit this Joint Claim Construction and Prehearing Statement for U.S. Patent Nos. 6,508,122 ('122 Patent) and 6,671,648 ('648 Patent) (collectively the "Asserted Patents").

I. LPR 132(a) – AGREED CONSTRUCTIONS

There are no terms proposed for construction for which the parties agree on the proper construction.

II. LPR 132(b) – PROPOSED CONSTRUCTIONS FOR DISPUTED TERMS

The parties provide their proposed constructions and their identification of the supporting evidence in the chart below.

Disputed Claim Language	**Plaintiff's Proposed Construction and Evidence in Support**	**Defendants' Proposed Construction and Evidence in Support**
"A microelectromechanical system (MEMS) for measuring angular rate of a carrier" ('122 patent, claim 1)	Preamble is a limitation <u>Intrinsic evidence</u>: '122 patent at (54); Abstract; 1:14-17; 1:33-40; 2:7-14; 2:31-34; 3:66-4:8; 4:21-14; 4:25-38; 4:57-64; 4:65-5:20; 5:57-6:3; 6:18-19; 7:45-46; Figures 1-5; claim 1; claim 2	Preamble is not limiting <u>Intrinsic evidence</u>: '122 patent: Figs. 2-4, 6-7; 1:38-67; 3:55-63; 4:15-20; 4:49-56; 4:65-5:34; 5:41-45; 5:47-67; 6:4-14; 7:4-5; 7:43-44; 7:61-9:37 '122 patent file history: Sep. 15, 2000 Application at 24-37; Feb. 1, 2002 Non-Final Rejection at 2-12; Aug. 8, 2002 Amendment at 1-18; Aug. 13, 2002 Supplemental Amendment at 1-3; Sep. 6, 2002 Office Action at 2; Sep. 16, 2002 Notice of Allowance
"A micro inertial measurement unit" ('648 patent, claims 1, 4)	"inertial measurement unit that uses micro-electrical-mechanical (MEMS) sensors" <u>Intrinsic evidence</u>: '648 patent at (54); Abstract; 1:11-16; 2:6-14; 2:24-50; 2:62-3:3; 3:5-28; 5:9-11; 5:31-41;	Preamble is not limiting <u>Intrinsic evidence</u>: '648 patent: Figs. 1, 4, 7, 11, 17-19; 1:19-54; 2:10-45; 3:14-17; 6:54-7:9; 8:11-9:13; 9:21-10:4; 10:58-65; 11:38-42; 16:46-

IPR2024-00668
AGNC EX2016

	6:41-47; 16:31-39; 16:46-49; 17:19-36; 17:63-18:23; Figures 11, 17-19; claims 1, 2, 4 Extrinsic evidence: American GNC, 2000CMIMU coremicro IMU User Manual, Jan. 2004, V.2.2	17:18; 17:37-18:23; 18:47-61; 21:63-22:10 '648 patent file history: Oct. 22, 2001 Application at 45-46; Mar. 7, 2003 Non-Final Rejection at 2-4; Jun. 16, 2003 Response to Office Action at 1-2; Jul. 10, 2003 Office Action at 2-3; Jul. 14, 2003 Notice of Allowance
"displacement restoring signal" ('122 patent, claim 1)	Plain and ordinary meaning, which is a signal for restoring a displacement. Intrinsic evidence: '122 patent at Abstract, 2:22; 4:34-38; 8:65-9:4; Figure 6; claims 1, 7 U.S. Patent No. 6,311,555 at 8:35-37; 9:64-10:6; claims 4, 13, 14, 55 IPR2024-00667, Petition for *Inter Partes* Review, at 6	"electrical signal used to oppose displacement of inertial element(s) caused by angular rotation" Intrinsic evidence: '122 patent: Figs. 1-3, 6-7; Abstract; 2:15-30; 3:8-22; 4:15-20; 4:31-5:41; 5:48-6:14; 7:21-25; 7:61-9:37; 9:55-16:55 '122 patent file history: Sep. 15, 2000 Application at 24-37; Feb. 1, 2002 Non-Final Rejection at 2-12; Aug. 8, 2002 Amendment at 1-18; Aug. 13, 2002 Supplemental Amendment at 1-3; Sep. 6, 2002 Office Action at 2; Sep. 16, 2002 Notice of Allowance
"inertial element displacement signals" ('122 patent, claim 1)	Plain and ordinary meaning, which is signals representing displacement of inertial element(s). Intrinsic evidence: '122 patent at Abstract; 4:40-48; Figures 6, 7; claim 1 U.S. Patent No. 6,311,555 at 2:50-58; 9:3-12; 10:35-51; 11:39-44; claims 1, 8-10, 15 IPR2024-00667, Petition for *Inter Partes* Review, at 6	"electrical signals reflecting dither motion of inertial element(s)" Intrinsic evidence: '122 patent: Figs. 1-3, 6-7; Abstract; 2:15-30; 3:8-22; 4:15-20; 4:31-5:41; 5:48-6:14; 7:21-25; 7:61-9:37; 9:55-16:55 '122 patent file history: Sep. 15, 2000 Application at 24-37; Feb. 1, 2002 Non-Final Rejection at 2-12; Aug. 8, 2002 Amendment at 1-18; Aug. 13, 2002 Supplemental Amendment at 1-3; Sep. 6, 2002 Office Action at 2; Sep. 16, 2002 Notice of Allowance

IPR2024-00668
AGNC EX2016

"said vehicle" ('648 patent, claim 4)	"said carrier" Intrinsic evidence: '648 patent at Abstract; 1:11-19; 1:37-42; 2:53-60; 2:65-3:5; 6:41-48; 6:54-60; 8:12-19; 8:44-45; 8:51-52; 12:35-36; 16:5-11; 19:1-2; claims 3, 4 U.S. Patent No. 6,456,939 at Abstract; 1:7-15; 1:34-40; 2:51-55; 2:62-3:2; 6:38-45; 6:51-57; 8:11-16; 8:42-44; 8:49-50; 12:33-34; 16:5-11; 19:16-17; claims 2, 3, 17, 28, 44, 51, 61, 75 Extrinsic evidence: U.S. Patent No. 6,311,555 U.S. Patent No. 6,508,122 Random House Kernerman Webster's College Dictionary, © 2010 K Dictionaries Ltd. ("any means in or by which someone or something is carried or conveyed") Random House Webster's College Dictionary, © 2005, pg. 1355 ("any means in or by which someone or something is carried or conveyed") Merriam-Webster's Collegiate Dictionary Tenth Edition, © 1999, pg. 1309 ("an agent of transmission: CARRIER") American Heritage® Dictionary of the English Language, Fifth Edition. Copyright © 2016, pg. 1919 ("a conveyance" "Latin *vehiculum* < *vehere*, to carry;") American Heritage® College Dictionary, 3d Edition © 1997, pg. 1495 ("a conveyance" "Lat. *vehiculum* < *vehere*, to carry.")	"a device or structure for transporting persons or things" Intrinsic evidence: '648 patent: Figs. 3, 4, 15, 16, 19; 1:10-44; 2:54-3:13; 3:29-4:28; 6:41-60; 8:11-18; 8:34-54; 12:29-39; 16:5-11; 16:46-51; 18:47-19:15; 24:27-35 '648 patent file history: Oct. 22, 2001 Application at 45-46; Mar. 7, 2003 Non-Final Rejection at 2-4; Jun. 16, 2003 Response to Office Action at 1-2; Jul. 10, 2003 Office Action at 2-3; Jul. 14, 2003 Notice of Allowance Extrinsic evidence: *The American Heritage Dictionary of the English Language* (3d Ed.) (1996) ("A device or structure for transporting persons or things[.]") *McGraw-Hill Dictionary of Scientific and Technical Terms* (5th Ed.) (1994) definition of "vehicle" ("A structure, machine, or device, such as an aircraft or rocket, designed to carry a burden through air or space.") *Webster's Dictionary* (1997) definition of "vehicle" ("a motorized device for transporting goods, equipment, or passengers") *McGraw-Hill Dictionary of Scientific and Technical Terms* (5th Ed.) (1994) definition of "carrier" ("Any machine for transporting materials or people.")

IPR2024-00668
AGNC EX2016

III. LPR 132(c) – TEN MOST IMPORTANT DISPUTED TERMS

Through meet and confer, the parties have limited the number of disputed terms to five.

IV. LPR 132(d) – ANTICIPATED TIME FOR HEARING

The parties agree that 4 hours will be a necessary length of time for the Claim Construction Hearing if live testimony or a tutorial is presented, otherwise 3 or less hours would be required.

V. LPR 132(e) – PROPOSED ORDER OF PRESENTATION AT HEARING.

After the briefing is complete, and prior to the hearing, the parties will meet and confer regarding the order of presentation of terms.

VI. LPR 132(f) – LIVE TESTIMONY AT THE HEARING

The exchange of expert testimony has just begun and thus, the potential need for live testimony at the hearing is unknown. As a result, the parties currently reserve the right to present live testimony from experts at the hearing, but will further evaluate the need and update the court once briefing is complete. Nintendo's claim construction expert is Thomas Kenny, Ph.D.

VII. LPR 132(g) – TUTORIAL

The parties believe that an in-person technology tutorial in advance of the Claim Construction Hearing would be beneficial. The parties suggest that the tutorial either occur a week or two in advance of the hearing, or alternatively based on the Court's preference, at the beginning of the hearing.

VIII. LPR 132(h) – PREHEARING CONFERENCE

The parties do not believe a pre-hearing conference prior to the Claim Construction Hearing is necessary.

IX. LPR 132(i) – INDEPENDENT EXPERT

The parties do not suggest appointment of an independent, court-appointed expert.

X. PLAINTIFF'S REQUIRED DISCLOSURES – STANDING ORDER § D

Based on its preliminary investigations and the (incomplete) productions and responses of Defendants and Third Parties, American GNC accuses Nintendo of directly and indirectly

IPR2024-00668
AGNC EX2016

infringing the following Asserted Claims of the Asserted Patents.

Asserted Patent	Asserted Claims	Statutory Subsections
U.S. Pat. No. 6,508,122 ("'122 Patent")	1, 3	35 U.S.C. § 271 (a), (b), and (c)
U.S. Pat. No. 6,671,648 ("'648 Patent")	1, 4	35 U.S.C. § 271 (a), (b), and (c)

The Accused Products, which are each accused of infringing each of the claims above, include the Nintendo Switch and Switch Lite consoles, the Nintendo Joy-Con and Pro controllers, as well as other controllers sold or licensed by Nintendo for use with the Switch during the term of the Asserted Patents that use the same or similar motion-sensing components.

American GNC reserves all rights under the applicable rules and orders to seeks the Court's permission to supplement the above identification of Asserted Claims and Asserted Products as this litigation progresses, including in response to additional information to be produced by Defendants or Third Parties here.

XI. DEFENDANTS' REQUIRED DISCLOSURES – STANDING ORDER § D

A. '122 Patent

1. Bases of Invalidity of the '122 Patent[1]

a) Grounds of Invalidity of the '122 Patent

Defendants contend that claims 1 and 3 of the '122 Patent are invalid on the following grounds:

- Unpatentable subject matter (35 U.S.C. § 101);
- Anticipation (35 U.S.C. § 102);
- Obviousness (35 U.S.C. § 103); and
- Lack of written description and enablement (35 U.S.C. § 112).

[1] Nintendo also notes that it recently filed a petition for *inter partes* review directed at the invalidity of the '122 patent.

IPR2024-00668
AGNC EX2016

Defendants may have additional grounds of invalidity depending on the outcome of the Court's claim construction.

b) Identification of Anticipation and/or Obviousness References

As set forth in Defendants' invalidity contentions, Defendants identify the following prior art references as the basis for Defendants' anticipation and obviousness invalidity arguments. Additional references may also serve as the basis for Defendants' anticipation and obviousness invalidity arguments depending on the outcome of the Court's claim construction.

i. Patents & Published Patent Applications

Nickname	Patent or Publication No.	Country of Origin
Bernstein	US5349855	USA
Cardarelli	US6481283	USA
Fujiyoshi	US5945599	USA
Hotelling	US5698784	USA
Kano	US5895851	USA
Konovalov	US6073490	USA
Kumar	US5604311	USA
MacGugan	US4896268A	USA
Mitamura '973	JPH0942973A	Japan
Sapuppo	US5881598	USA
Ward	US5481914	USA
White	US5577073	USA
Wyse '718	US5983718	USA
Wyse '986	US5987986	USA

ii. Prior Art Publications

IPR2024-00668
AGNC EX2016

	Title	Date [2]	Publisher
Boxenhorn	The Micromechanical Inertial Guidance System and its Application	October 3-5, 1989	Central Inertial Guidance Test Facility Guidance Test Division
Chau	An Integrated Force-Balanced Capacitive Accelerometer for Low-G Applications	June 25-29, 1995	IEEE
Hulsing	MEMS Inertial Rate and Acceleration Sensor	1998	IEEE
Lemkin	Micro Accelerometer Design with Digital Feedback Control	1997	
Park	Laterally Oscillated and Force-Balanced Micro Vibratory Rate Gyroscope Supported by Fish-Hook-Shaped Springs	June 12-16, 1994	TRF
Putty	A Micromachined Vibrating Ring Gyroscope (paper)	June 12-16, 1994	TRF
Soderkvist	Micromachined Gyroscopes	May 1994	Sensors and Actuators A: Physical (Elsevier)
Tang	Silicon Bulk Micromachined Vibratory Gyroscope	June 2-6, 1996	TRF
Torti	Electrostatically Suspended and Sensed Micromechanical Rate Gyroscope	July 13, 1994	SPIE

iii. Public Prior Art Uses or Sales of Products and Systems

[2] With discovery on-going, Defendants reserve all rights to rely on earlier dates if discovery yields additional information.

IPR2024-00668
AGNC EX2016

Product[3]	Company that used/offered/sold
IS-300	Intersense
IS-600	Intersense
ADXL05	Analog Devices, Inc.
ADXL50	Analog Devices, Inc.
ENV-05H-01	Murata Manufacturing Co., Ltd.
ENV-05H-02	Murata Manufacturing Co., Ltd.
ACH-04-08-05	Measurement Specialties
EGAX	Entran
3021	IC Sensors
Gyrostar	Murata Manufacturing Co., Ltd.
Donner GyroChip II	Systron
ARS-C132-1A	Watson
BEI Gyrochip Model QRS11	BEI
Crossbow CXL04M3/CXL25M3	Crossbow Technology
Crossbow CXTILT02	Crossbow Technologies
Crossbow DMU-6/6X	Crossbow Technology
Crossbow DMU-VGX	Crossbow Technology
Crossbow DMU-AHRS	Crossbow Technology
Microsoft SideWinder Freestyle Pro	Microsoft

[3] Nintendo also intends to rely on documentations about these products that it has cited in its Invalidity Contentions.

IPR2024-00668
AGNC EX2016

Product[3]	Company that used/offered/sold
Tuning Fork Gyro	Draper Labs

B. '648 Patent

1. Bases of Invalidity of the '648 Patent[4]

a) Grounds of Invalidity of the '648 Patent

Defendants contend that claims 1 and 4 of the '648 Patent are invalid on the following grounds:

- Unpatentable subject matter (35 U.S.C. § 101);
- Anticipation (35 U.S.C. § 102);
- Obviousness (35 U.S.C. § 103); and
- Lack of written description and enablement (35 U.S.C. § 112).

Defendants may have additional grounds of invalidity depending on the outcome of the Court's claim construction.

b) Identification of Anticipation and/or Obviousness References

As set forth in Defendants' invalidity contentions, Defendants identify the following prior art references as the basis for Defendants' anticipation and obviousness invalidity arguments. Additional references may also serve as the basis for Defendants' anticipation and obviousness invalidity arguments depending on the outcome of the Court's claim construction.

i. Patents & Published Patent Applications

Nickname	Patent or Publication No.	Country of Origin
Alft	US6315062	USA
Alm	CA2330635A1	Canada
Bidaud	US7164975	USA
Chowdhary	US6282496	USA

[4] Nintendo also notes that it recently filed a petition for *inter partes* review directed at the invalidity of the '648 patent.

IPR2024-00668
AGNC EX2016

Nickname	Patent or Publication No.	Country of Origin
Foxlin ’077	US5645077	USA
Glynn	US5181181	USA
Hashimoto	US5554980	USA
Horton ’622	US6421622	USA
Horton ’947	US6853947	USA
Horton ’055	US7216055	USA
Hulsing	US5396797	USA
Ide	US5598187	USA
Ignagni	US6553322	USA
Kano	US5895851	USA
Kumar	US5604311	USA
Mark ’093	US5890093	USA
Medan	EP0429391A1	EU
Mitamura ’973	JPH0942973A	Japan
Olson	US4787051	USA
Roszhart	US5656778	USA
Sapuppo	US5881598	USA
Schiffman	US6002974	USA
Stewart	US4841773	USA
Tazartes	US5422817	USA
Tingleff	US4424038	USA
White	US5577073	USA

ii. Prior Art Publications

	Title	Date [5]	Publisher
Foxlin	Miniature 6-DOF inertial system for tracking HMDs	Apr. 13-14, 1998	SPIE

[5] With discovery on-going, Defendants reserve all rights to rely on earlier dates if discovery yields additional information.

IPR2024-00668
AGNC EX2016

	Title	Date [5]	Publisher
Herman	Subsystems for the Extended Range Interceptor (ERINT-1) Missile	May 19-21, 1992	USASDC
Tang	Silicon Bulk Micromachined Vibratory Gyroscope	June 2-6, 1996	TRF

iii. Public Prior Art Uses or Sales of Products and Systems

Product[6]	Company that used/offered/sold
IS-300	Intersense
IS-600	Intersense
ADXL05	Analog Devices, Inc.
ADXL50	Analog Devices, Inc.
ENV-05H-01	Murata Manufacturing Co., Ltd.
ENV-05H-02	Murata Manufacturing Co., Ltd.
ACH-04-08-05	Measurement Specialties
EGAX	Entran
3021	IC Sensors
Gyrostar	Murata Manufacturing Co., Ltd.
Donner GyroChip II	Systron
ARS-C132-1A	Watson
BEI Gyrochip Model QRS11	BEI
Crossbow CXL04M3/CXL25M3	Crossbow Technology
Crossbow CXTILT02	Crossbow Technologies

[6] Nintendo also intends to rely on documentations about these products that it has cited in its Invalidity Contentions.

IPR2024-00668
AGNC EX2016

Product[6]	Company that used/offered/sold
Crossbow DMU-6/6X	Crossbow Technology
Crossbow DMU-VGX	Crossbow Technology
Crossbow DMU-AHRS	Crossbow Technology
Microsoft SideWinder Freestyle Pro	Microsoft
Tuning Fork Gyro	Draper Labs

C. Identification of Background References

To the extent it is required by the Court's Order, Nintendo identifies the following references that it intends to rely on to show the state of the art at the time of the alleged inventions, in addition to the references listed above under anticipation and/or obviousness:

1. Patents & Published Patent Applications

Nickname	Patent or Publication No.	Country of Origin
Abe	US6636826	USA
Andersson	US5245552	USA
Challoner '765	US7836765	USA
Challoner '733	US6289733B1	USA
Cho	KR19980031895A	Korea
Clark	US6230563	USA
Doty	US5841537	USA
Dunn '835	US5313835	USA
Dunn '893	US5359893	USA
Felsing	US5573011	USA
Ferrari	US6209394	USA
Foxlin '191	US6162191	USA
Foxlin '837	US6176837	USA
Foxlin '507	US6361507B1	USA
Foxlin '284	US5807284	USA

IPR2024-00668
AGNC EX2016

Nickname	Patent or Publication No.	Country of Origin
Fritze	US5225889	USA
Fujikawa	JPH09329438A	Japan
Geen ’638	US5635638	USA
Geen ’961	US6122961	USA
Geen ’651	US6516651	USA
Guenther	US6062082	USA
Hall	US4,470,562	USA
Horton ’132	US5615132	USA
Hsu	US5955668	USA
Hulsing	US5241861	USA
Kaneko	JPH0979859A	Japan
Kato	US6044707	USA
Kobayashi	US5396757	USA
Krogmann	US4914598A	USA
Kumamoto	JPH0666568A	Japan
Lemkin ’612	US6253612	USA
Lemkin ’032	US6386032	USA
Li	CN1054489A	China
Lundeen	US4802766	USA
Lutz	US5604312	USA
Lutz	US5728936	USA
Marinelli	US6157898	USA
Mark ’401	US5331401A	USA
Marrin	US5875257A	USA
Maru	JPH11295089A	Japan
Mitamura ’776	JPH08159776A	Japan
Mitamura ’986	US5908986	USA
Moriya	US5900549	USA
Muenzel	WO1997015066A2	Germany
Murata	US6257058	USA

IPR2024-00668
AGNC EX2016

Nickname	Patent or Publication No.	Country of Origin
Murphy	US5530342	USA
Netzer	WO1996026445A1	Israel
Nguyen	US5491604	USA
O'Brien	US5392650	USA
Ogata	US6001014	USA
Paley	US5481957	USA
Putty	US5450751	USA
Shaw	US 4,303,978	USA
Smith	WO1986005017A1	USA
Tang	US5894090	USA
Touge ’961	US6134961	USA
Touge ’157	US6250157	USA
Townshend	US6276204	USA
Ueno	US5012428	USA
Ueshima	US7932908	USA
Weinberg	US5783973	USA
Yamamoto	US5987989	USA
Yoshimura	DE19634663A1	Germany
Yoshino	US6122962	USA
You	CN1224147A	China
Zabler	US5275047	USA

2. Prior Art Publications

	Title	Date [7]	Publisher
Adams	Single-Crystal Silicon Gyroscope with Decoupled Drive and Sense	Aug. 31, 1999	SPIE

[7] With discovery on-going, Defendants reserve all rights to rely on earlier dates if discovery yields additional information.

IPR2024-00668
AGNC EX2016

	Title	Date [7]	Publisher
Allen	Integrated Micro-Electro-Mechanical Sensor Development for Inertial Applications	Apr. 20-23, 1996	IEEE
An	Dual-Axis Microgyroscope with Closed-Loop Detection	Mar. 9, 1999	Sensors and Actuators A: Physical (Elsevier)
Benbasat	An Inertial Measurement Unit for User Interfaces	Sept. 2000	MIT
Bernstein	A Micromachined Comb-Drive Tuning Fork Rate Gyroscope	Feb. 10, 1993	IEEE
Borenstein	Where am I? Sensors and Methods for Mobile Robot Positioning	Apr. 1996	U. Mich.
Boser	Electronics for Micromachined Inertial Sensors	June 16-19, 1997	IEEE
Chow	Software Architecture, Path Planning, and Implementation for an Autonomous Robot	May 1996	MIT
Clark	Surface Micromachined Z-Axis Vibratory Rate Gyroscope	June 2-6, 1996	TRF
Connelly	Micro-Electromechanical Instrument and Systems Development at the Charles Stark Draper Laboratory	1995	
Greiff	Silicon Monolithic Micromechanical Gyroscope	June 24-27, 1991	IEEE
Hashimoto	Silicon Resonant Angular Rate Sensor Using Electromagnetic Excitation and Capacitive Detection	1995	IOP
Jiang	Capacitive Position-Sensing Interface for Micromachined Inertial Sensors	2003	U. Cal. Berkeley (ProQuest)
Juneau	Micromachined Dual Input Axis Rate Gyroscope	1997	U. Cal. Berkeley (ProQuest)

IPR2024-00668
AGNC EX2016

	Title	Date [7]	Publisher
Kuisma	A Bulk Micromachined Silicon Angular Rate Sensor	June 19, 1997	IEEE
Luthi	Low Cost Inertial Navigation System	2000	ETH
Lutz	A Precision Yaw Rate Sensor in Silicon Micromachining	June 19, 1997	IEEE
Ma	A Bulk-Silicon Capacitive Microaccelerometer with Built-In Overrange and Force Feedback Electrodes	June 12-16, 1994	TRF
Matthews	Hemispherical Resonator Gyro for Precision Pointing Applications	June 12-16, 1994	SPIE
Painter	Structural and Thermal Modeling of A Z-Axis Rate Integrating Gyroscope	2003	IOP
Putty	A Micromachined Vibrating Ring Gyroscope (dissertation)	1995	UMI
Randle	Low Cost Navigation Using Micro-Machined Technology	Nov. 12, 1997	IEEE
Roszhart	An Inertial-Grade, Micromachined Vibrating Beam Accelerometer	June 25-29, 1995	IEEE
Sparks	A CMOS Integrated Surface Micromachined Angular Rate Sensor	June 16-19, 1997	IEEE
Sparks	Angular rate sensor and accelerometer combined on the same micromachined CMOS chip	1998	Springer-Verlag
Staple	The Impact of Emerging MEMS-Based Microsystems on US Defense Applications	Jan. 20, 2000	
Tanaka	A Micromachined Vibrating Gyroscope	Jan. 29-Feb. 2, 1995	IEEE
Verplaetse	Inertial Proprioceptive Devices: Self-Motion-sensing Toys and Tools	1996	IBM
Voss	Silicon Angular Rate Sensor for Automotive Applications with	June 16-19, 1997	IEEE

IPR2024-00668
AGNC EX2016

	Title	Date [7]	Publisher
	Piezoelectric Drive and Piezoresistive Read-out		
Yazdi	Micromachined Inertial Sensors	Aug. 1998	IEEE
You	Hybrid Inertial and Vision Tracking for Augmented Reality Registration	1999	
Zarabadi	An Angular Rate Sensor Interface IC	May 5-8, 1996	IEEE

3. Public Prior Art Uses or Sales of Products and Systems

Product	Company that used/offered/sold
ADXL202/210	Analog Devices, Inc.
7130	Silicon Microstructures
1210	Silicon Designs
HGA-V	Hitachi
HGA-D	Hitachi

Dated:

By: */s/ Matthew J. Brigham*

Matthew J. Brigham (*pro hac vice*)
Dena Chen (*pro hac vice*)
Patrick Lauppe (*pro hac vice*)
COOLEY LLP
3175 Hanover Street
Palo Alto, CA 94304-1130
Tel. (650) 843-5000
Fax: (650) 849-7400
mbrigham@cooley.com
dchen@cooley.com
plauppe@cooley.com

Stephen R. Smith (*pro hac vice*)
COOLEY LLP
1299 Pennsylvania Ave NW, Suite 700
Washington, D.C. 20004
Telephone: +1 202 842 7800
Fax: +1 202 842 7899
stephen.smith@cooley.com

Lawrence D. Graham (Bar No. 25402)
Mark P. Walters (Bar No. 30819)
LOWE GRAHAM JONES
1325 Fourth Avenue, Suite 1130
Seattle, WA 98101
Telephone: +1 206 381 3300
Fax: +1 206 381 3301
graham@lowegrahamjones.com
walters@lowegrahamjones.com

For Defendants
Nintendo of America, Inc. and Nintendo Co., Ltd.

Presented by,

By: */s/ Michael N. Zachary*

Corey Johanningmeier (*pro hac vice*)
Michael N. Zachary (WSBA No. 27064)
BUNSOW DE MORY LLP
701 El Camino Real
Redwood City, CA 94063
Telephone: (650) 351-7248
Facsimile: (415) 426-4744
cjohanningmeier@bdiplaw.com
mzachary@bdiplaw.com

Attorneys for Plaintiff
American GNC Corp.

CERTIFICATE OF SERVICE

The undersigned attorney certifies that on March 22, 2024, I directed the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel on record in the matter.

/s/ Michael N. Zachary

Corey Johanningmeier (*pro hac vice*)
Michael N. Zachary (WSBA No. 27064)
BUNSOW DE MORY LLP
701 El Camino Real
Redwood City, CA 94063
Telephone: (650) 351-7248
Facsimile: (415) 426-4744
cjohanningmeier@bdiplaw.com
mzachary@bdiplaw.com

Attorneys for Plaintiff
American GNC Corp.

IPR2024-00668
AGNC EX2016