EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS LUFKIN DIVISION

ANASCAPE, LTD.,

Plaintiff, 8Civ il Action No.: 9:06-CV-00158-RC

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v. § JUDGE RONALD CLARK

MICROSOFT CORP. and NINTENDO OF AMERICA INC.

Defendants.

DEFENDANT NINTENDO OF AMERICA INC.'S PRELIMINARY INVALIDITY CONTENTIONS

Pursuant to the Court's Scheduling Order and Patent Local Rules (particularly P.R. 3-3), Defendant Nintendo of America Inc. ("NOA") hereby submits its preliminary invalidity contentions identifying prior art and other grounds that invalidate the asserted claims of U.S. Patent Nos. 6,344,791 ("the '791 Patent"), 6,351,205 ("the '205 Patent"), 6,563,415 ("the '415 Patent"), 6,906,700 ("the '700 Patent") and 6,222,525 ("the '525 Patent"). In addition, NOA herewith submits its document production pursuant to P.R. 3-4.

NOA's preliminary invalidity contentions address the claims of the '791, '205, '415, 700 and '525 patents asserted against NOA in Anascape, Ltd.'s ("Anascape") Disclosure of Asserted Claims and Preliminary Infringement Contentions ("Infringement Contentions"). Thus, NOA's invalidity contentions take into consideration the same features and capabilities of the prior art disclosures as embraced by the claim scope necessary to read the asserted claims on the accused products in accordance with Anascape's Infringement Contentions. However, none of NOA's

Exhibits 9-37 are photographs of prior art products that have been annotated to correspond with the limitations of the asserted claims. Physical samples of the products shown in Exhibits 9-37, as well as the products shown in certain other photographs included with NOA's document production will be made available for inspection by Anascape at a reasonable time and location.

It is not clear from the Infringement Contentions what Anascape alleges to be the proper scope of the asserted claims. Accordingly, Exhibit 38 sets out additional prior art references included with NOA's Rule 3-4 document production but not specifically applied to the asserted claims below that may take on added significance once the alleged and/or adjudicated scope of the asserted claims is determined. NOA reserves the right to rely on any of these additional references alone or in combination with any other additional references or references cited herein.

NOA reserves the right to modify, amend, or otherwise supplement its invalidity contentions.

I. **IDENTIFICATION OF PRIOR ART**

The following is a list of prior art references that defendant NOA contends anticipates (pursuant to 35 U.S.C. § 102) and/or renders obvious (pursuant to 35 U.S.C. § 103) one or more of the asserted claims of the '791 Patent, the '205 Patent, the '415 Patent, the '700 Patent and the '525 Patent.

NO.	PRIOR ART REFERENCES
1.	"A Mouse for Fast Typists," Inc. (Dec. 1992)
2.	"Atari 5200 Owner's Manual," Atari (c. 1982)
3.	"Cyberman 3D Controller Programming Supplement, Version 1.0 (draft 5 – 8/23/93)," Logitech Inc. (1993)
4.	"Cyberman™ 3D Controller," Logitech Inc. (1993)
5.	"Design Specifications for Membrane Keyboards," CSI Keyboards, Inc. (1988)
6.	"Hot PC Products," Electronic Design, vol. 38, no. 11 at 22 (June 14, 1990)

110.	Japanese Laid Open Utility Model Application No. 63-20241, Published 1988
111.	Japanese Laid Open Utility Model Application No. 58-174741, Published 1983
112.	Japanese Laid Open Utility Model Application No. 62-278614, Published 1987
113.	Japanese Laid Open Utility Model Application No. 56-57473, Published 1981
114.	PlayStation R4: Ridge Racer Type 4 Manual, Namco Ltd. (1998)
115.	U.S. Patent No. 5,278,557 (Stokes et al), Issued Jan. 11, 1994
116.	U.S. Patent No. 6,563,415 (Duchon et al.), Issued Dec. 17, 1996
117.	Buxton, William and Brad A. Myers, "A Study in Two-Handed Input,"
	Proceedings of CHI '86 at 321-26 (1986)
118.	Bell Labs Video, Bell Labs (1982)
119.	globaldevices.com website (pre-1999)
120.	Akamatsu et al. at 483-493, "Movement Characteristics Using A Mouse with Tactile and Force Feedback", Int'l J. of Human-Computer Studies, 483-493 (1996)
121.	Buxton, William, Ralph Hill and Peter Rowley, "Issues and Techniques in Touch- Sensitive Tablet Input," SIGGRAPH '85 at 215-24(1985)
122.	Armstrong Offer to Sell to Howard Cheng (1997) (ANS0061739)
123.	Minsky, Margaret, Ming Ouh-young, Oliver Steele, Frederick P. Brooks, Jr., Max Behensky, "Feeling and Seeing: Issues in Force Display," pages 235-43 Association for Computing Machinery (1990)
124.	Iwata, Hiroo, "Artificial Reality with Force-Feedback: Development of Desktop Virtual Space with Compact Master Manipulator," Computer Graphics vol. 24, no. 4 at 165-70 (Aug. 1990)