EXHIBIT 2

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

Anascape, Ltd., Plaintiff, v. Microsoft Corp., and Nintendo of America, Inc., Defendants.	Civil Action No. 9:06-cv-158-RC JURY TRIAL REQUESTED

ANASCAPE, LTD.'S AMENDED DISCLOSURE OF ASSERTED CLAIMS AND PRELIMINARY INFRINGEMENT CONTENTIONS

In compliance with the Scheduling Order, Patent Rule 3-1, and Patent Rule 3-6(a)(1), Plaintiff Anascape, Ltd. ("Anascape") submits its Amended Disclosure of Asserted Claims and Preliminary Infringement Contentions against Defendant Microsoft Corp. ("Microsoft"), which Anascape believes, in good faith, that the Court's Claim Construction Ruling require.

I. Disclosure of Asserted Claims and Preliminary Infringement Contentions

Patent Rule 3-1(c)-(d)

Each asserted claim is literally infringed by the Defendants' accused products as indicated by the infringement claim charts attached hereto. In the alternative, any asserted claim not found to be literally infringed is infringed under the doctrine of equivalents as described in the attached charts. Charts identifying specifically where each element of each asserted claim is found within each accused instrumentality are attached as Exhibits A-C, E, K and R.

Discovery is ongoing in this matter, and Anascape reserves the right to supplement its contentions.

DATED: December 12, 2007.

Respectfully submitted,

McKOOL SMITH, P.C.

/s/ Luke F. McLeroy
Sam Baxter
Lead Attorney
Texas State Bar No. 01938000
sbaxter@mckoolsmith.com
P.O. Box O
505 E. Travis, Suite 105
Marshall, Texas 75670
Telephone: (903) 927-2111
Facsimile: (903) 927-2622

Theodore Stevenson, III
Texas State Bar No. 19196650
tstevenson@mckoolsmith.com
Luke F. McLeroy
Texas State Bar No. 24041455
lmcleroy@mckoolsmith.com
McKool Smith, P.C.
300 Crescent Court, Suite 1500
Dallas, Texas 75201
Telephone: (214) 978-4000
Telecopier: (214) 978-4044

Robert M. Parker
Texas State Bar No. 15498000
rmparker@pbatyler.com
Robert Christopher Bunt
Texas State Bar No. 00787165
rcbunt@pbatyler.com
Charles Ainsworth
Texas State Bar No. 00783521
charley@pbatyler.com
Parker, Bunt & Ainsworth P.C.
100 E. Ferguson Street, Suite 1114
Tyler, Texas 75702
Telephone: (903) 531-3535
Telecopier: (903) 533-9687

ATTORNEYS FOR PLAINTIFF ANASCAPE, LTD.

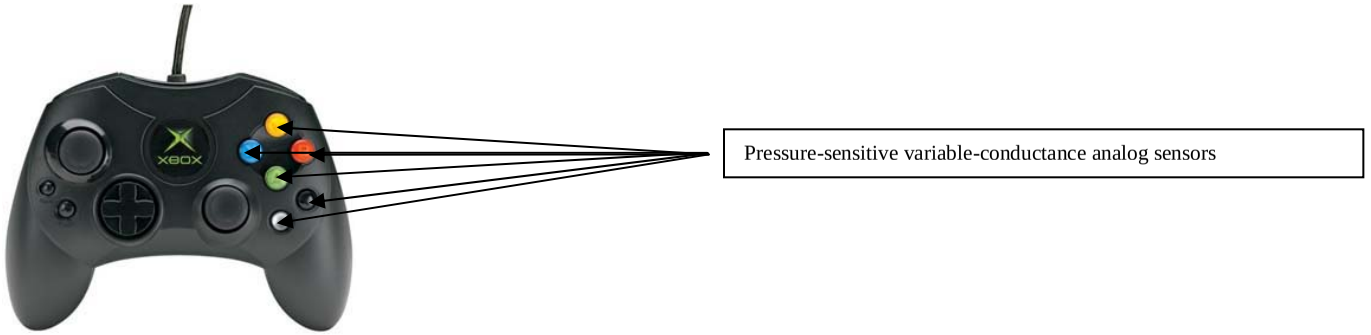
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on counsel of record via Federal Express on this 12th day of December, 2007.

/s/ Luke F. McLeroy

Luke F. McLeroy

EXHIBIT A – INFRINGEMENT OF U.S. PATENT NO. 5,999,084 BY MICROSOFT'S XBOX CONTROLLER AND XBOX CONTROLLER S AND ACCOMPANYING VIDEO GAME SYSTEMS ("ACCUSED INSTRUMENTALITIES")

CLAIM LANGUAGE	ACCUSED INSTRUMENTALITIES
5. An improved pressure-sensitive variable-conductance analog sensor of the type having	The Accused Instrumentalities include, among other things, an improved pressure-sensitive variable-conductance analog sensor. Multiple pressure-sensitive variable-conductance sensors are shown below in Microsoft's Xbox Controller S, one of the Accused Instrumentalities.  Under the language of the claim and/or the Court's November 30, 2007 Claim Construction Order, this claim element, to the extent it is a limitation of the claim, requires "pressure-sensitive variable conductance material." The Court's November 30, 2007 Claim Construction Order construed the claim term "pressure-sensitive variable conductance material" as "a substance that changes in conductivity to allow a greater flow of electric current through it, as pressure is applied to it." Literal Infringement This "pressure-sensitive variable conductance material" is literally met in the Accused Instrumentalities by the thin, black "FSR material," which was identified in the figures throughout this chart when it was originally served. The "FSR material" literally meets this claim element because it is "a substance that changes in conductivity to allow a greater flow of electric current through it, as pressure is applied to it." Generally, the following evidence developed during the discovery in this case substantiates Anascape's assertion that this element is literally met: the deposition testimony of Robert Walker and Steve Branton and corresponding exhibits, the Yaniger patent, the Accused Instrumentalities themselves, and the specific documents and excerpts cited below. Doctrine of Equivalents The action buttons of the Accused Instrumentalities provide a varying output based on the input pressure or force applied to the button caps, due to the interaction between the action buttons, the dome caps, the FSR Material, and the PCB traces. See Walker 106:6-107:4 (describing how these different components work together); Depo Exs. 14 and 16 (showing the relative position of these components). There is a substantially convex area of flexible material located on the underside of the dome cap, which flattens on the application of increasing pressure to the action button cap, and causes a larger amount of FSR material to contact the PCB traces, thereby increasing the conductivity of the sensor associated with that action button. See Depo. Ex. 63 at INT199, Branton Tr. at 57:16-58:8. The FSR Material is

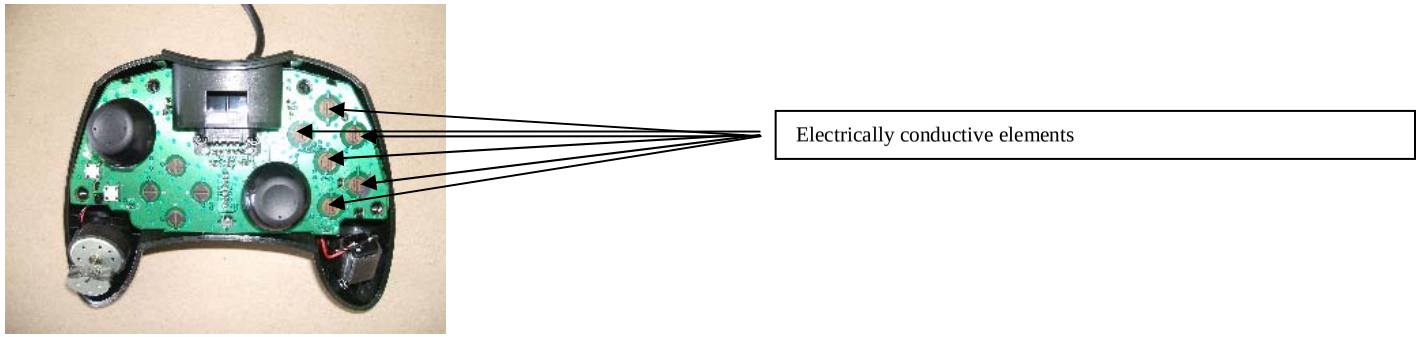
CLAIM LANGUAGE	ACCUSED INSTRUMENTALITIES
	comprised of a polysulfone plastic film, (which is softer than the semiconductor layer, and gives under pressure) on which a semiconductor layer of carbon and tin oxide is printed. See Branton Tr. at 33:3-9, 33:23-34:4, 34:8-19, 47:1-5, 51:10-24, 52:7-13. The surface of the semiconductor layer -- which faces the circuit traces in the xbox controllers -- is not perfectly flat, but irregular, because particles of tin oxide "stick out" from the surface of the material. See Branton Tr. 50:10-16. When the FSR Material first contacts the traces, only the tin oxide particles that "stick out" the furthest from the material contact the traces. See Branton Tr. at 50:10-16. As the actuator is pressed harder against the back side of the material, more tin oxide particles contact the traces, increasing the number of paths for electricity to move, decreasing the resistance of the FSR Material. See Branton Tr. at 50:17-51:2; Depo Ex. 11 at MSANAS22135; Depo Ex. 12 at MSANAS25182. The "FSR Material" of the Accused Instrumentalities is equivalent to "pressure-sensitive variable conductance material" because it performs substantially the same function -- creating an analog response that varies in response to applied pressure -- in substantially the same way -- by rearranging conductive elements in order to increase the number of conductive paths (as confirmed by the detailed descriptions of the Yaniger and Mitchell patents and the Asserted Patents) -- to yield substantially the same result -- an analog output that varies in response to applied pressure. In light of this discussion, there is only an "insubstantial change" between the "FSR Material" of the Accused Instrumentalities and the "pressure-sensitive variable conductance material" of the patent claim.
at least two electrically conductive elements operationally connected to pressure-sensitive variable-conductance material;	The Accused Instrumentalities include, among other things, at least two electrically conductive elements operationally connected to pressure-sensitive variable-conductance material. Multiple sets of two pressure-sensitive electrically conductive elements are shown below in Microsoft's Xbox Controller S, one of the Accused Instrumentalities.  Under the language of the claim and/or the Court's November 30, 2007 Claim Construction Order, this claim element, to the extent it is a limitation of the claim, requires "pressure-sensitive variable conductance material." The Court's November 30, 2007 Claim Construction Order construed the claim term "pressure-sensitive variable conductance material" as "a substance that changes in conductivity to allow a greater flow of electric current through it, as pressure is applied to it." <u>Literal Infringement</u>

EXHIBIT A – INFRINGEMENT OF U.S. PATENT NO. 5,999,084 BY MICROSOFT'S XBOX CONTROLLER AND XBOX CONTROLLER S AND ACCOMPANYING VIDEO GAME SYSTEMS ("ACCUSED INSTRUMENTALITIES")

CLAIM LANGUAGE	ACCUSED INSTRUMENTALITIES
	This "pressure-sensitive variable conductance material" is literally met in the Accused Instrumentalities by the thin, black "FSR material," which was identified in the figures throughout this chart when it was originally served. The "FSR material" literally meets this claim element because it is "a substance that changes in conductivity to allow a greater flow of electric current through it, as pressure is applied to it." Generally, the following evidence developed during the discovery in this case substantiates Anascape's assertion that this element is literally met: the deposition testimony of Robert Walker and Steve Branton and corresponding exhibits, the Yaniger patent, the Accused Instrumentalities themselves, and the specific documents and excerpts cited below. <u>Doctrine of Equivalents</u> The action buttons of the Accused Instrumentalities provide a varying output based on the input pressure or force applied to the button caps, due to the interaction between the action buttons, the dome caps, the FSR Material, and the PCB traces. See Walker 106:6-107:4 (describing how these different components work together); Depo Exs. 14 and 16 (showing the relative position of these components). There is a substantially convex area of flexible material located on the underside of the dome cap, which flattens on the application of increasing pressure to the action button cap, and causes a larger amount of FSR material to contact the PCB traces, thereby increasing the conductivity of the sensor associated with that action button. See Depo. Ex. 63 at INT199, Branton Tr. at 57:16-58:8. The FSR Material is comprised of a polysulfone plastic film, (which is softer than the semiconductor layer, and gives under pressure) on which a semiconductor layer of carbon and tin oxide is printed. See Branton Tr. at 33:3-9, 33:23-34:4, 34:8-19, 47:1-5, 51:10-24, 52:7-13. The surface of the semiconductor layer -- which faces the circuit traces in the xbox controllers -- is not perfectly flat, but irregular, because particles of tin oxide "stick out" from the surface of the material. See Branton Tr. 50:10-16. When the FSR Material first contacts the traces, only the tin oxide particles that "stick out" the furthest from the material contact the traces. See Branton Tr. at 50:10-16. As the actuator is pressed harder against the back side of the material, more tin oxide particles contact the traces, increasing the number of paths for electricity to move, decreasing the resistance of the FSR Material. See Branton Tr. at 50:17-51:2; Depo Ex. 11 at MSANAS22135; Depo Ex. 12 at MSANAS25182. The "FSR Material" of the Accused Instrumentalities is equivalent to "pressure-sensitive variable conductance material" because it performs substantially the same function -- creating an analog response that varies in response to applied pressure -- in substantially the same way -- by rearranging conductive elements in order to increase the number of conductive paths (as confirmed by the detailed descriptions of the Yaniger and Mitchell patents and the Asserted Patents) -- to yield substantially the same result -- an analog output that varies in response to applied pressure. In light of this discussion, there is only an "insubstantial change" between the "FSR Material" of the Accused Instrumentalities and the "pressure-sensitive variable conductance material" of the patent claim.
a depressible actuator retained relative to said pressure-sensitive variable-conductance material;	The Accused Instrumentalities include, among other things, a depressible actuator retained relative to the pressure-sensitive variable-conductance material. Multiple depressible actuators are shown below in Microsoft's Xbox Controller S, one of the Accused Instrumentalities.

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	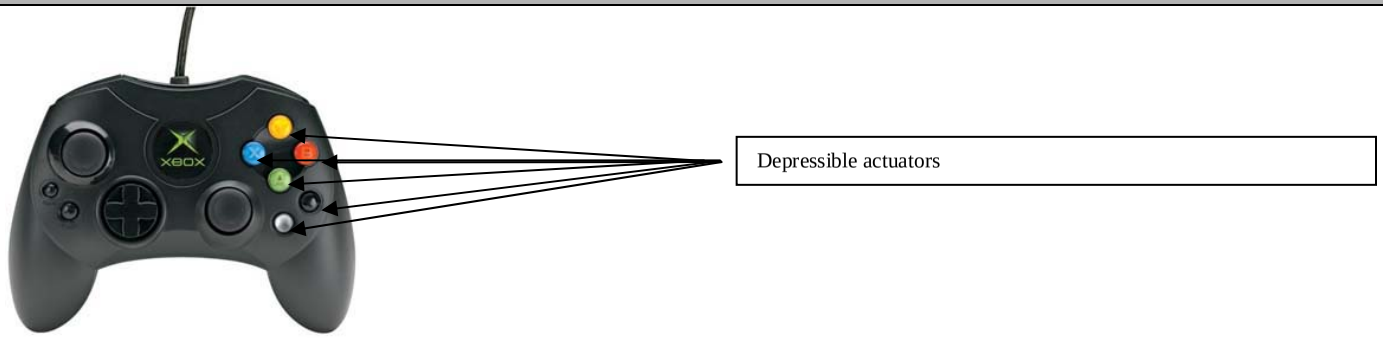 Under the language of the claim and/or the Court's November 30, 2007 Claim Construction Order, this claim element, to the extent it is a limitation of the claim, requires "pressure-sensitive variable conductance material." The Court's November 30, 2007 Claim Construction Order construed the claim term "pressure-sensitive variable conductance material" as "a substance that changes in conductivity to allow a greater flow of electric current through it, as pressure is applied to it." <u>Literal Infringement</u> This "pressure-sensitive variable conductance material" is literally met in the Accused Instrumentalities by the thin, black "FSR material," which was identified in the figures throughout this chart when it was originally served. The "FSR material" literally meets this claim element because it is "a substance that changes in conductivity to allow a greater flow of electric current through it, as pressure is applied to it." Generally, the following evidence developed during the discovery in this case substantiates Anascape's assertion that this element is literally met: the deposition testimony of Robert Walker and Steve Branton and corresponding exhibits, the Yaniger patent, the Accused Instrumentalities themselves, and the specific documents and excerpts cited below. <u>Doctrine of Equivalents</u> The action buttons of the Accused Instrumentalities provide a varying output based on the input pressure or force applied to the button caps, due to the interaction between the action buttons, the dome caps, the FSR Material, and the PCB traces. See Walker 106:6-107:4 (describing how these different components work together); Depo Exs. 14 and 16 (showing the relative position of these components). There is a substantially convex area of flexible material located on the underside of the dome cap, which flattens on the application of increasing pressure to the action button cap, and causes a larger amount of FSR material to contact the PCB traces, thereby increasing the conductivity of the sensor associated with that action button. See Depo. Ex. 63 at INT199, Branton Tr. at 57:16-58:8. The FSR Material is comprised of a polysulfone plastic film, (which is softer than the semiconductor layer, and gives under pressure) on which a semiconductor layer of carbon and tin oxide is printed. See Branton Tr. at 33:3-9, 33:23-34:4, 34:8-19, 47:1-5, 51:10-24, 52:7-13. The surface of the semiconductor layer -- which faces the circuit traces in the xbox controllers -- is not perfectly flat, but irregular, because particles of tin oxide "stick out" from the surface of the material. See Branton Tr. 50:10-16. When the FSR Material first contacts the traces, only the tin oxide particles that "stick out" the furthest from the material contact the traces. See Branton Tr. at 50:10-16. As the actuator is pressed

CLAIM LANGUAGE	ACCUSED INSTRUMENTALITIES
	harder against the back side of the material, more tin oxide particles contact the traces, increasing the number of paths for electricity to move, decreasing the resistance of the FSR Material. See Branton Tr. at 50:17-51:2; Depo Ex. 11 at MSANAS22135; Depo Ex. 12 at MSANAS25182. The "FSR Material" of the Accused Instrumentalities is equivalent to "pressure-sensitive variable conductance material" because it performs substantially the same function -- creating an analog response that varies in response to applied pressure -- in substantially the same way -- by rearranging conductive elements in order to increase the number of conductive paths (as confirmed by the detailed descriptions of the Yaniger and Mitchell patents and the Asserted Patents) -- to yield substantially the same result -- an analog output that varies in response to applied pressure. In light of this discussion, there is only an "insubstantial change" between the "FSR Material" of the Accused Instrumentalities and the "pressure-sensitive variable conductance material" of the patent claim.
said actuator depressible toward said pressure-sensitive variable-conductance material for transferring force into said pressure-sensitive variable-conductance material;	The actuators of the Accused Instrumentalities are depressible toward pressure-sensitive variable-conductance material for transferring force into the pressure-sensitive variable-conductance material. Under the language of the claim and/or the Court's November 30, 2007 Claim Construction Order, this claim element, to the extent it is a limitation of the claim, requires "pressure-sensitive variable conductance material." The Court's November 30, 2007 Claim Construction Order construed the claim term "pressure-sensitive variable conductance material" as "a substance that changes in conductivity to allow a greater flow of electric current through it, as pressure is applied to it." <u>Literal Infringement</u> This "pressure-sensitive variable conductance material" is literally met in the Accused Instrumentalities by the thin, black "FSR material," which was identified in the figures throughout this chart when it was originally served. The "FSR material" literally meets this claim element because it is "a substance that changes in conductivity to allow a greater flow of electric current through it, as pressure is applied to it." Generally, the following evidence developed during the discovery in this case substantiates Anascape's assertion that this element is literally met: the deposition testimony of Robert Walker and Steve Branton and corresponding exhibits, the Yaniger patent, the Accused Instrumentalities themselves, and the specific documents and excerpts cited below. <u>Doctrine of Equivalents</u> The action buttons of the Accused Instrumentalities provide a varying output based on the input pressure or force applied to the button caps, due to the interaction between the action buttons, the dome caps, the FSR Material, and the PCB traces. See Walker 106:6-107:4 (describing how these different components work together); Depo Exs. 14 and 16 (showing the relative position of these components). There is a substantially convex area of flexible material located on the underside of the dome cap, which flattens on the application of increasing pressure to the action button cap, and causes a larger amount of FSR material to contact the PCB traces, thereby increasing the conductivity of the sensor associated with that action button. See Depo. Ex. 63 at INT199, Branton Tr. at 57:16-58:8. The FSR Material is comprised of a polysulfone plastic film, (which is softer than the semiconductor layer, and gives under pressure) on which a semiconductor layer of carbon and tin oxide is printed. See Branton Tr. at 33:3-9, 33:23-34:4, 34:8-19, 47:1-5, 51:10-24, 52:7-13. The surface of the semiconductor layer -- which faces the circuit traces in the xbox controllers -- is not perfectly flat, but irregular, because particles of tin

EXHIBIT A – INFRINGEMENT OF U.S. PATENT NO. 5,999,084 BY MICROSOFT'S XBOX CONTROLLER AND XBOX CONTROLLER S AND ACCOMPANYING VIDEO GAME SYSTEMS ("ACCUSED INSTRUMENTALITIES")

CLAIM LANGUAGE	ACCUSED INSTRUMENTALITIES
	oxide "stick out" from the surface of the material. See Branton Tr. 50:10-16. When the FSR Material first contacts the traces, only the tin oxide particles that "stick out" the furthest from the material contact the traces. See Branton Tr. at 50:10-16. As the actuator is pressed harder against the back side of the material, more tin oxide particles contact the traces, increasing the number of paths for electricity to move, decreasing the resistance of the FSR Material. See Branton Tr. at 50:17-51:2; Depo Ex. 11 at MSANAS22135; Depo Ex. 12 at MSANAS25182. The "FSR Material" of the Accused Instrumentalities is equivalent to "pressure-sensitive variable conductance material" because it performs substantially the same function -- creating an analog response that varies in response to applied pressure -- in substantially the same way -- by rearranging conductive elements in order to increase the number of conductive paths (as confirmed by the detailed descriptions of the Yaniger and Mitchell patents and the Asserted Patents) -- to yield substantially the same result -- an analog output that varies in response to applied pressure. In light of this discussion, there is only an "insubstantial change" between the "FSR Material" of the Accused Instrumentalities and the "pressure-sensitive variable conductance material" of the patent claim.
wherein the improvement comprises:	The Accused Instrumentalities comprise the following improvement.
a resilient snap-through dome-cap positioned to provide tactile feedback to a user upon actuation of said pressure-sensitive variable-conductance material.	Among other things, the Accused Instrumentalities include a resilient snap-through dome-cap positioned to provide tactile feedback to a user upon actuation of the pressure-sensitive variable-conductance material. Multiple resilient snap-through dome-caps are shown below in Microsoft's Xbox Controller S, one of the Accused Instrumentalities.

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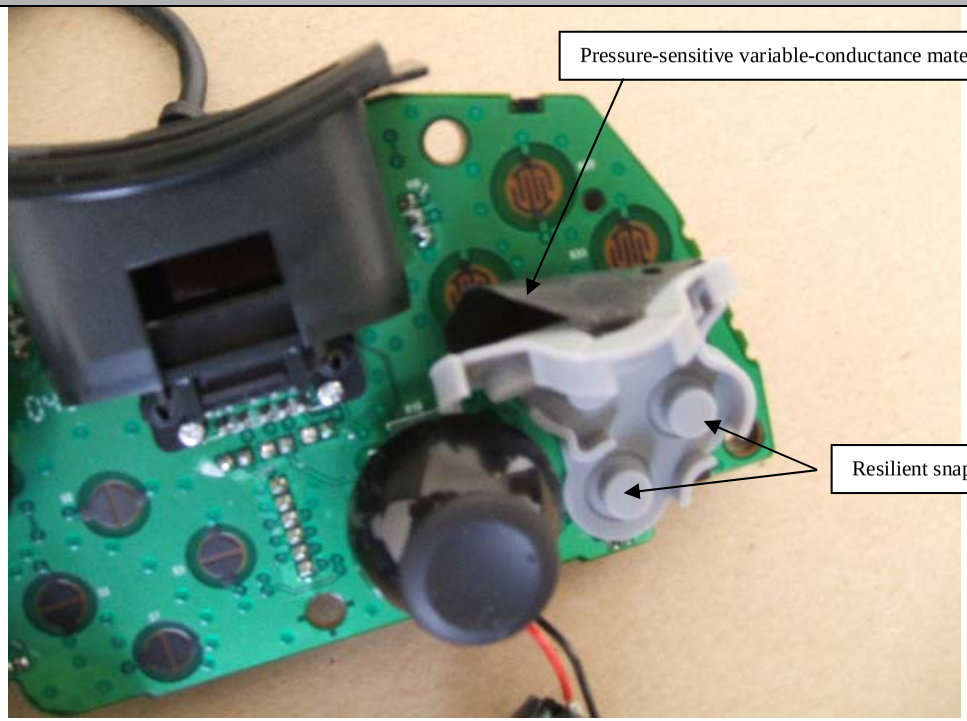
CLAIM LANGUAGE	ACCUSED INSTRUMENTALITIES
	 Under the language of the claim and/or the Court's November 30, 2007 Claim Construction Order, this claim element, to the extent it is a limitation of the claim, requires "pressure-sensitive variable conductance material." The Court's November 30, 2007 Claim Construction Order construed the claim term "pressure-sensitive variable conductance material" as "a substance that changes in conductivity to allow a greater flow of electric current through it, as pressure is applied to it." Literal Infringement This "pressure-sensitive variable conductance material" is literally met in the Accused Instrumentalities by the thin, black "FSR material," which was identified in the figures throughout this chart when it was originally served. The "FSR material" literally meets this claim element because it is "a substance that changes in conductivity to allow a greater flow of electric current through it, as pressure is applied to it." Generally, the following evidence developed during the discovery in this case substantiates Anascape's assertion that this element is literally met: the deposition testimony of Robert Walker and Steve Branton and corresponding exhibits, the Yaniger patent, the Accused Instrumentalities themselves, and the specific documents and excerpts cited below.

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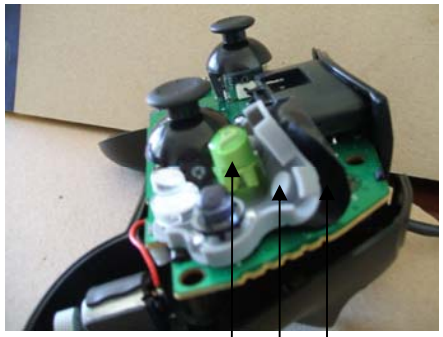
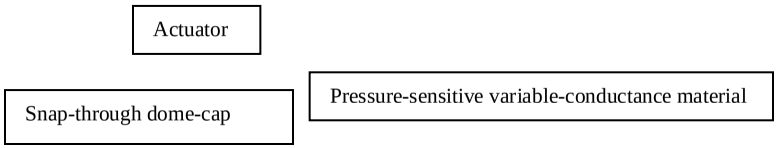
CLAIM LANGUAGE	ACCUSED INSTRUMENTALITIES
	Doctrine of Equivalents The action buttons of the Accused Instrumentalities provide a varying output based on the input pressure or force applied to the button caps, due to the interaction between the action buttons, the dome caps, the FSR Material, and the PCB traces. See Walker 106:6-107:4 (describing how these different components work together); Depo Exs. 14 and 16 (showing the relative position of these components). There is a substantially convex area of flexible material located on the underside of the dome cap, which flattens on the application of increasing pressure to the action button cap, and causes a larger amount of FSR material to contact the PCB traces, thereby increasing the conductivity of the sensor associated with that action button. See Depo. Ex. 63 at INT199, Branton Tr. at 57:16-58:8. The FSR Material is comprised of a polysulfone plastic film, (which is softer than the semiconductor layer, and gives under pressure) on which a semiconductor layer of carbon and tin oxide is printed. See Branton Tr. at 33:3-9, 33:23-34:4, 34:8-19, 47:1-5, 51:10-24, 52:7-13. The surface of the semiconductor layer -- which faces the circuit traces in the xbox controllers -- is not perfectly flat, but irregular, because particles of tin oxide "stick out" from the surface of the material. See Branton Tr. 50:10-16. When the FSR Material first contacts the traces, only the tin oxide particles that "stick out" the furthest from the material contact the traces. See Branton Tr. at 50:10-16. As the actuator is pressed harder against the back side of the material, more tin oxide particles contact the traces, increasing the number of paths for electricity to move, decreasing the resistance of the FSR Material. See Branton Tr. at 50:17-51:2; Depo Ex. 11 at MSANAS22135; Depo Ex. 12 at MSANAS25182. The "FSR Material" of the Accused Instrumentalities is equivalent to "pressure-sensitive variable conductance material" because it performs substantially the same function -- creating an analog response that varies in response to applied pressure -- in substantially the same way -- by rearranging conductive elements in order to increase the number of conductive paths (as confirmed by the detailed descriptions of the Yaniger and Mitchell patents and the Asserted Patents) -- to yield substantially the same result -- an analog output that varies in response to applied pressure. In light of this discussion, there is only an "insubstantial change" between the "FSR Material" of the Accused Instrumentalities and the "pressure-sensitive variable conductance material" of the patent claim.
6. An improved pressure-sensitive variable-conductance analog sensor in accordance with claim 5 wherein said snap-through dome-cap is positioned between said actuator and said pressure-sensitive variable-conductance material.	The snap-through dome-caps of the Accused Instrumentalities are positioned between the actuator and the pressure-sensitive variable-conductance material. This positioning is shown below in Microsoft's Xbox Controller S, one of the Accused Instrumentalities. 

CLAIM LANGUAGE	ACCUSED INSTRUMENTALITIES
	 Under the language of the claim and/or the Court's November 30, 2007 Claim Construction Order, this claim element, to the extent it is a limitation of the claim, requires "pressure-sensitive variable conductance material." The Court's November 30, 2007 Claim Construction Order construed the claim term "pressure-sensitive variable conductance material" as "a substance that changes in conductivity to allow a greater flow of electric current through it, as pressure is applied to it." Literal Infringement This "pressure-sensitive variable conductance material" is literally met in the Accused Instrumentalities by the thin, black "FSR material," which was identified in the figures throughout this chart when it was originally served. The "FSR material" literally meets this claim element because it is "a substance that changes in conductivity to allow a greater flow of electric current through it, as pressure is applied to it." Generally, the following evidence developed during the discovery in this case substantiates Anascape's assertion that this element is literally met: the deposition testimony of Robert Walker and Steve Branton and corresponding exhibits, the Yaniger patent, the Accused Instrumentalities themselves, and the specific documents and excerpts cited below. Doctrine of Equivalents The action buttons of the Accused Instrumentalities provide a varying output based on the input pressure or force applied to the button caps, due to the interaction between the action buttons, the dome caps, the FSR Material, and the PCB traces. See Walker 106:6-107:4 (describing how these different components work together); Depo Exs. 14 and 16 (showing the relative position of these components). There is a substantially convex area of flexible material located on the underside of the dome cap, which flattens on the application of increasing pressure to the action button cap, and causes a larger amount of FSR material to contact the PCB traces, thereby increasing the conductivity of the sensor associated with that action button. See Depo. Ex. 63 at INT199, Branton Tr. at 57:16-58:8. The FSR Material is comprised of a polysulfone plastic film, (which is softer than the semiconductor layer, and gives under pressure) on which a semiconductor layer of carbon and tin oxide is printed. See Branton Tr. at 33:3-9, 33:23-34:4, 34:8-19, 47:1-5, 51:10-24, 52:7-13. The surface of the semiconductor layer -- which faces the circuit traces in the xbox controllers -- is not perfectly flat, but irregular, because particles of tin oxide "stick out" from the surface of the material. See Branton Tr. 50:10-16. When the FSR Material first contacts the traces, only the tin oxide particles that "stick out" the furthest from the material contact the traces. See Branton Tr. at 50:10-16. As the actuator is pressed harder against the back side of the material, more tin oxide particles contact the traces, increasing the number of paths for electricity to move, decreasing the resistance of the FSR Material. See Branton Tr. at 50:17-51:2; Depo Ex. 11 at MSANAS22135; Depo Ex. 12 at MSANAS25182. The "FSR Material" of the Accused Instrumentalities is equivalent to "pressure-sensitive variable conductance material" because it performs substantially the same function -- creating an analog response that varies in response to applied pressure -- in substantially the

CLAIM LANGUAGE	ACCUSED INSTRUMENTALITIES
	same way -- by rearranging conductive elements in order to increase the number of conductive paths (as confirmed by the detailed descriptions of the Yaniger and Mitchell patents and the Asserted Patents) -- to yield substantially the same result -- an analog output that varies in response to applied pressure. In light of this discussion, there is only an "insubstantial change" between the "FSR Material" of the Accused Instrumentalities and the "pressure-sensitive variable conductance material" of the patent claim.
11. An improved method of manufacturing a pressure-sensitive analog variable-conductance sensor, comprising the steps of:	The pressure-sensitive analog variable-conductance sensors in the Accused Instrumentalities are manufactured according to an improved method of manufacturing a pressure-sensitive analog variable-conductance sensor. Under the language of the claim and/or the Court's November 30, 2007 Claim Construction Order, this claim element, to the extent it is a limitation of the claim, requires "pressure-sensitive variable conductance material." The Court's November 30, 2007 Claim Construction Order construed the claim term "pressure-sensitive variable conductance material" as "a substance that changes in conductivity to allow a greater flow of electric current through it, as pressure is applied to it." <u>Literal Infringement</u> This "pressure-sensitive variable conductance material" is literally met in the Accused Instrumentalities by the thin, black "FSR material," which was identified in the figures throughout this chart when it was originally served. The "FSR material" literally meets this claim element because it is "a substance that changes in conductivity to allow a greater flow of electric current through it, as pressure is applied to it." Generally, the following evidence developed during the discovery in this case substantiates Anascape's assertion that this element is literally met: the deposition testimony of Robert Walker and Steve Branton and corresponding exhibits, the Yaniger patent, the Accused Instrumentalities themselves, and the specific documents and excerpts cited below. <u>Doctrine of Equivalents</u> The action buttons of the Accused Instrumentalities provide a varying output based on the input pressure or force applied to the button caps, due to the interaction between the action buttons, the dome caps, the FSR Material, and the PCB traces. See Walker 106:6-107:4 (describing how these different components work together); Depo Exs. 14 and 16 (showing the relative position of these components). There is a substantially convex area of flexible material located on the underside of the dome cap, which flattens on the application of increasing pressure to the action button cap, and causes a larger amount of FSR material to contact the PCB traces, thereby increasing the conductivity of the sensor associated with that action button. See Depo. Ex. 63 at INT199, Branton Tr. at 57:16-58:8. The FSR Material is comprised of a polysulfone plastic film, (which is softer than the semiconductor layer, and gives under pressure) on which a semiconductor layer of carbon and tin oxide is printed. See Branton Tr. at 33:3-9, 33:23-34:4, 34:8-19, 47:1-5, 51:10-24, 52:7-13. The surface of the semiconductor layer -- which faces the circuit traces in the xbox controllers -- is not perfectly flat, but irregular, because particles of tin oxide "stick out" from the surface of the material. See Branton Tr. 50:10-16. When the FSR Material first contacts the traces, only the tin oxide particles that "stick out" the furthest from the material contact the traces. See Branton Tr. at 50:10-16. As the actuator is pressed harder against the back side of the material, more tin oxide particles contact the traces, increasing the number of paths for electricity to move, decreasing the resistance of the FSR Material. See Branton Tr. at 50:17-51:2; Depo Ex. 11 at MSANAS22135; Depo Ex. 12 at MSANAS25182.

EXHIBIT A – INFRINGEMENT OF U.S. PATENT NO. 5,999,084 BY MICROSOFT'S XBOX CONTROLLER AND XBOX CONTROLLER S AND ACCOMPANYING VIDEO GAME SYSTEMS ("ACCUSED INSTRUMENTALITIES")

CLAIM LANGUAGE	ACCUSED INSTRUMENTALITIES
	The "FSR Material" of the Accused Instrumentalities is equivalent to "pressure-sensitive variable conductance material" because it performs substantially the same function -- creating an analog response that varies in response to applied pressure -- in substantially the same way -- by rearranging conductive elements in order to increase the number of conductive paths (as confirmed by the detailed descriptions of the Yaniger and Mitchell patents and the Asserted Patents) -- to yield substantially the same result -- an analog output that varies in response to applied pressure. In light of this discussion, there is only an "insubstantial change" between the "FSR Material" of the Accused Instrumentalities and the "pressure-sensitive variable conductance material" of the patent claim.
forming two conductive elements;	During the manufacture of the Accused Instrumentalities, two conductive elements are formed. The conductive elements are shown above. *See* claim 5.
locating pressure-sensitive variable-conductance material positioned as a variably conductive element electrically between said two conductive elements;	During the manufacture of the Accused Instrumentalities, pressure sensitive variable conductance material is located as a variably conductive electrical element between the two conductive elements. The pressure-sensitive variable-conductance material in Microsoft's Xbox Controller S, one of the Accused Instrumentalities, is shown above. *See* claims 5 & 6.
positioning an actuator for transferring externally applied force onto said pressure-sensitive analog variable-conductance material;	During the manufacture of the Accused Instrumentalities, an actuator is positioned for transferring externally applied force onto the pressure sensitive analog variable conductance material. The actuator in Microsoft's Xbox Controller S, one of the Accused Instrumentalities, is shown above. *See* claims 5 & 6.
wherein the improvement comprises the step of;	The Accused Instrumentalities comprise the following improvement.
positioning a resilient tactile feedback dome-cap operationally associated with said pressure-sensitive variable-conductance material.	During the manufacture of the Accused Instrumentalities, a resilient tactile feedback dome-cap is positioned as operationally associated with the pressure sensitive variable conductance material. The resilient tactile feedback dome-cap in Microsoft's Xbox Controller S, one of the Accused Instrumentalities, is shown above. *See* claims 5 & 6.