

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

IRONBURG INVENTIONS LTD, a United  
Kingdom Limited Company,

Plaintiff,

vs.

VALVE CORPORATION, a Washington  
Corporation,

Defendant.

Civil Action No.  
1:15-cv-04219-TWT

**PARTIES' PATENT L.R. 6.3  
JOINT CLAIM CONSTRUCTION STATEMENT**

In accordance with Patent Local Rule 6.3, Plaintiff Ironburg Inventions LTD (“Ironburg”) and Defendant Valve Corporation (“Valve”) hereby provide their Joint Claim Construction Statement.

**I. AGREED CONSTRUCTIONS OF CLAIM TERMS, PHRASES, AND CLAUSES**

There are currently no constructions of claim terms, phrases, or clauses for which the parties agree. The parties agree that any terms or phrases not listed in the table in Exhibit 1 do not need to be construed by the Court and should instead be understood to have their plain and ordinary meaning.

**II. PROPOSED CONSTRUCTIONS AND SUPPORT FOR EACH DISPUTED CLAIM TERM, PHRASE, OR CLAUSE**

Ironburg and Valve’s proposed constructions for each disputed claim term, phrase, or clause, along with citations to all intrinsic and extrinsic evidence each party intends to rely upon is attached as Exhibit 1.

**III. ANTICIPATED LENGTH OF A CLAIM CONSTRUCTION HEARING**

If the Court is to hold a Claim Construction Hearing, Ironburg anticipates that the parties should each have one hour to present their respective positions on claim construction. Valve anticipates that the claim construction issues could be addressed in approximately three hours.

**IV. IDENTITY OF WITNESSES AND SUMMARY OF OPINIONS TO BE OFFERED BY EXPERT WITNESSES**

In the event the Court holds a Claim Construction Hearing, the parties identify the witnesses they intend to call at the Hearing along with summaries of opinions to be offered by expert witnesses as follows:

**A. Ironburg**

Ironburg proposes to call witness Duncan Ironmonger and expert witness Glen Stevick. A copy of Mr. Ironmonger's CV is attached as Exhibit 2. A copy of Mr. Stevick's CV is attached as Exhibit 3 and a summary of Mr. Stevick's opinions to be offered is attached as Exhibit 4.

**B. Valve**

Valve proposes to call expert witness Robert Dezmelyk. A summary of Mr. Dezmelyk's opinions to be offered is attached as Exhibit 5.

Respectively submitted this 22nd day of November, 2016.

/s/ Robert D. Becker

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VALVE CORPORATION

**CERTIFICATE OF SERVICE**

I hereby certify that on November 22, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all attorneys of record.

/s/ Robert D. Becker  
Robert D. Becker

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