

EXHIBIT 1

**PROPOSED CONSTRUCTIONS AND SUPPORT FOR
DISPUTED CLAIM TERMS, PHRASES, AND CLAUSES**

No.	Term/Phrase/Clause	Patent Claim(s)	Ironburg's Proposed Construction and Support	Valve's Proposed Construction and Support
1.	directional references such as "top," "bottom," "front," "back," "end," "side," "inner," "outer," "upper," and "lower"	Ubiquitous in all four patents-in-suit	<p>"[D]irectional references ... do not limit the respective features to such orientation, but merely serve to distinguish these features from one another."</p> <p><u>Intrinsic Evidence:</u> '525 Patent: Fig. 1; Fig. 2; Fig. 3; 2:30-35; 2:63-68; 4:28-32; Claim 1, Claim 20; Oct. 29, 2012 Response to Office Action at 6-9; Feb. 4, 2013 Office Action; Jun. 28, 2012 Office Action.</p> <p>'770 Patent: Fig. 1; Fig. 2; Fig. 3; 2:30-35; 2:63-68; 4:26-31.</p> <p>'688 Patent: Fig. 1; Fig. 2; Fig. 4; 4:19-27; 9:21-25</p> <p>'229 Patent: Fig. 1; Fig. 2; Fig. 3; Fig. 4; 23:65-24:2</p>	<p>As used in the claims, these directional references do not limit the respective features to any particular orientation. Instead, they merely serve to distinguish these features from one another and define positions relative to each other. For example, the "front" is opposite the "back," and the "top" is opposite the "bottom."</p> <p style="text-align: center;"><u>Support:</u> Expert declaration and testimony; IPR2016-00948, Paper 10, at 8-9; IPR2016-00949, Paper 10, at 8-9; '525 Patent 4:27-31; '770 Patent 4:27-31; '688 Patent 9:21-25; '229 Patent 23:65-24:2</p>

No.	Term/Phrase/Clause	Patent Claim(s)	Ironburg's Proposed Construction and Support	Valve's Proposed Construction and Support
			<p><u>Extrinsic Evidence:</u> Witness and expert declaration and testimony</p> <p>Ironburg objects to the Expert Declaration of Mr. Dezmelyk as untimely and outside of the scope of the rules. Mr. Dezmelyk goes far beyond the brief summary contemplated by the rules and Ironburg has no time to provide a corresponding report.</p>	
2.	“elongate member”	‘525 Patent, Claims 1, 20 ‘770 Patent, Claim 1	<p>Not indefinite.</p> <p><u>Intrinsic Evidence:</u> ‘525 Patent, Fig. 2; Fig. 3; 1:59-61; 3:33-38; 4:15-19; Claim 1, Claim 20; Oct. 29, 2012 Response to Office Action at 2, 5, 8-9.</p> <p><u>Extrinsic Evidence:</u> ‘229 Patent, Fig. 2; Fig. 3; Fig.</p>	<p>Indefinite</p> <p><u>Support:</u> Expert declaration and testimony; IPR2016-00948, Paper 10, at 11-13; IPR2016-00949, Paper 10, at 11-13; ‘525 Patent/’770 Patent 1:9-14; 1:56-2:13; 2:47-49; 3:7-</p>

No.	Term/Phrase/Clause	Patent Claim(s)	Ironburg's Proposed Construction and Support	Valve's Proposed Construction and Support
			<p>4; Fig. 6; Fig. 9; Fig. 13; Fig. 17; Fig. 21; Fig. 25; Fig. 26; Fig. 27; Fig. 30A; Fig. 31A; Fig. 32A; Fig. 33; Fig. 34A; Fig. 35A; Fig. 36A; Fig. 37A; Fig. 39A; Fig. 41A; Fig. 44; 2:4-11; 2:17-21; 2:46-49; 2:50-54; 2:55-62; 2:63- 3:4; Claims 1-5, 9-12, 15-18.</p> <p>Witness and expert declaration and testimony</p>	<p>12; 3:34-38; 3:51-61; 4:4-9; 4:16-23; Fig. 2; Fig. 3; 10/29/12 Response.</p>
3.	<p>“elongate member” ...“is inherently resilient and flexible”</p>	<p>‘525 Patent, Claim 1</p>	<p>“a member that may be bent or flexed by a load, such as a finger, and will return to its unbiased position when not under load.”</p> <p><u>Intrinsic Evidence:</u> ‘525 Patent, Fig. 3; 1:59-61; 3:33-38; 4:15-19; Claim 1, Claim 20; Oct. 29, 2012 Response to Office Action at 2, 5, 8-9.</p>	<p>Valve objects to Ironburg’s proposed construction of this phrase as untimely and prejudicial because it was first disclosed to Valve as a disputed term for construction on the November 22 filing deadline. As indicated above with respect to phrase 2, Valve submits that “elongate member” is indefinite. Valve contends that “inherently resilient and flexible” should be given its</p>

No.	Term/Phrase/Clause	Patent Claim(s)	Ironburg's Proposed Construction and Support	Valve's Proposed Construction and Support
			<u>Extrinsic Evidence:</u> Witness and expert declaration and testimony	plain and ordinary meaning.
4.	"substantially the full distance between the top edge and the bottom edge"	'525 Patent, Claims 1, 20	<p>Not indefinite.</p> <p>The top and bottom edges are shown in the figures and the controls extend substantially the full distance.</p> <p>In the alternative: "substantially" – "largely but not wholly what is specified." "top edge" – "the top (uppermost) surface of the controller." "bottom edge" – "the bottom (lowest) surface of the controller"</p> <p><u>Intrinsic Evidence:</u> '525 Patent, 1:15-16; 1:26-28; 1:49-51; 2:15-19; 3:47-50; 3:51-</p>	<p>Indefinite</p> <p><u>Support:</u> Expert declaration and testimony; IPR2016-00948, Paper 10, at 11-13; '525 Patent 1:16-17; 1:27-29; 2:15-19; 2:50-52; 2:61-67; 3:51-56; 4:53-54; 6:25-26; Figs. 2, 3; 6/17/11 Application; 10/29/12 Amendment; 5/16/13 Amendment.</p>

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