

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

IRONBURG INVENTIONS LTD. a
United Kingdom Limited Company,

Plaintiff,

vs.

VALVE CORPORATION, a
Washington Corporation,

Defendant.

Civil Action No.

1:15-cv-04219-TWT

**DECLARATION OF ROBERT D. BECKER IN SUPPORT OF PLAINTIFF
IRONBURG INVENTIONS LTD.'S OPENING CLAIM CONSTRUCTION
BRIEF**

I, Robert D. Becker, do hereby state, as follows:

1. I am an attorney with Manatt, Phelps & Phillips, counsel for Plaintiff. I have personal knowledge of the matters described in this declaration, including through my work with other attorneys on this matter, and am competent to testify about these matters.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Oxford Living Dictionaries' definition of "Pipe".

3. Attached hereto as **Exhibit 2** is a true and correct copy of Oxford Living Dictionaries' definition of "Tunnel".

4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the transcript of Mr. Dezmelyk's December 1, 2016 deposition.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 22, 2016, in San Francisco, California.

/s/ Robert D. Becker
Robert D. Becker

CERTIFICATE OF SERVICE

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

/s/ Robert D. Becker
Robert D. Becker

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