

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

IRONBURG INVENTIONS LTD.,

*Plaintiff,*

v.

VALVE CORPORATION,

*Defendant.*

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

**DEFENDANT VALVE CORPORATION'S  
OPENING CLAIM CONSTRUCTION BRIEF**

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The four asserted patents—U.S. Patent Nos. 8,641,525 (“the ’525 patent”), 9,089,770 (“the ’770 patent”), 9,289,688 (“the ’688 patent”), and 9,352,229 (“the ’229 patent”) (collectively, “the Asserted Patents”)—relate to hand-held controllers for playing video games. Plaintiff Ironburg Inventions Ltd. (“Ironburg”) asserts that the Steam controller manufactured and sold by Defendant Valve Corporation (“Valve”) infringes nearly 80 claims spanning all four Asserted Patents.

Since filing their Joint Claim Construction Statement (Dkt. No. 64), the parties have continued to meet and confer in an attempt to streamline the issues before the Court. The parties have reached agreement as to two of the disputed terms. The parties agree to the following construction for the “directional references” listed at row 1 of the joint claim chart (Dkt. No. 64-1): “Directional references ... do not limit the respective features to such orientation, but merely serve to distinguish these features from one another.” The parties also agree that the Court does not need to construe the term “a portion” listed at row 12 of the claims chart. Instead, the parties agree this term should have its plain and ordinary meaning. Furthermore, Ironburg has indicated that it is withdrawing claim 13 of the ’525 patent from the list of asserted claims. Therefore, the parties agree that there is no longer any need for the Court to construe the phrase “the front end” (row 5), which only appears in that claim.

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