

**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

**[REDACTED VERSION
FILED PUBLICLY]**

**DEFENDANT VALVE CORPORATION'S MEMORANDUM IN SUPPORT
OF MOTION TO COMPEL SUPPLEMENTAL INFRINGEMENT
CONTENTIONS AND MOTION TO STRIKE DOCTRINE OF
EQUIVALENTS INFRINGEMENT CONTENTIONS**

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Defendant Valve Corporation (“Valve”) respectfully moves the Court, pursuant to Federal Rule of Civil Procedure 37 and Patent Local Rule 4.1, for an Order compelling Plaintiff Ironburg Inventions Ltd. (“Ironburg”) to serve supplemental infringement contentions that comply with Patent Local Rule 4.1 and, in addition, striking Ironburg’s contentions alleging infringement under the doctrine of equivalents.

I. INTRODUCTION

This is a patent infringement lawsuit, in which Ironburg alleges that Valve’s Steam controller infringes four of Ironburg’s patents. 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.

Ironburg’s infringement contentions are deficient in at least two ways. First, Ironburg refuses to identify where each limitation of each asserted claim is found within Valve’s Steam controller. For example, Ironburg’s contentions as to what portion of the Steam controller corresponds to the claimed “elongate member” are incomplete, vague, confusing, and inconsistent across the various asserted claims. Without a clear understanding of Ironburg’s infringement contention regarding “elongate member,” Valve’s ability to prepare a defense is handicapped. This is

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