

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

IRONBURG INVENTIONS LTD. a
United Kingdom Limited Company,

Plaintiff,

vs.

COLLECTIVE MINDS GAMING
CO. LTD., a Canadian Limited
Company,

Defendant.

JURY TRIAL DEMANDED

Civil Action No.

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Ironburg Inventions Ltd. (“Plaintiff”), by and through counsel, files this Complaint for patent infringement and demand for jury trial against Defendant Collective Minds Gaming Co. Ltd. (“Defendant”).

Plaintiff alleges as follows:

PARTIES

1. Plaintiff Ironburg Inventions Ltd. (“Ironburg”) is a company organized and existing under the laws of the United Kingdom having its principal place of business at 10 Market Place, Wincanton, BA9 9LP, Great Britain.
2. Ironburg conducts business in the United States by and through Scuf Gaming International, LLC (“Scuf Gaming”), a Georgia-based manufacturer, wholesaler, retailer, and restorer of custom video game equipment and accessories, including video game controllers (“gaming controllers”), which include Plaintiff’s patented technology.
3. On information and belief, Defendant Collective Minds Gaming Co. Ltd. (“Collective Minds”) is a company organized and existing under the laws of Canada, having a place of business at 8515 Place Devonshire, Suite 205, Mount Royal, Quebec H4P 2K1, Canada.

JURISDICTION AND VENUE

4. This is a complaint for patent infringement arising under the patent laws of

the United States, 35 U.S.C. § 1 *et seq.* This Court has subject matter jurisdiction under 28 U.S.C. §§1331 and 1338(a).

5. Defendant has committed acts and continues to commit acts within this District giving rise to this action, and venue is proper under 28 U.S.C. § 1391(b) and §1400(b).

6. On February 4, 2014, United States Patent No. 8,641,525 (hereafter the “'525 Patent”) entitled, “CONTROLLER FOR VIDEO GAME CONSOLE,” was duly and legally issued to Plaintiff Ironburg. A copy of the '525 Patent is annexed hereto as **Exhibit A**.

7. On July 28, 2015, United States Patent No. 9,089,770 (hereafter the “'770 Patent”) entitled, “CONTROLLER FOR VIDEO GAME CONSOLE,” which is a continuation of the '525 Patent, was duly and legally issued to Plaintiff Ironburg. A copy of the '770 Patent is annexed hereto as **Exhibit B**.

8. On March 22, 2016, United States Patent No. 9,289,688 (hereafter the “'688 Patent”) entitled, “GAMES CONTROLLER,” was duly and legally issued to Plaintiff Ironburg. A copy of the '688 Patent is annexed hereto as **Exhibit C**.

9. On May 31, 2016, United States Patent No. 9,352, 229 (hereinafter the “'229 Patent”) entitled “CONTROLLER FOR A GAMESCONSOLE,” was duly and legally issued to Ironburg. A copy of the '229 Patent is annexed hereto as

Exhibit D.

10. On April 12, 2016, United States Patent No. 9,308,450 (hereinafter the “450 Patent”) entitled “GAME CONTROLLER,” was duly and legally issued to Ironburg. A copy of the '450 Patent is annexed hereto as **Exhibit E**.

11. Plaintiff Ironburg is the owner and assignee of record of the 525, the '770, the '688, the '229 and the '450 Patents (together the “Patents-in-Suit”).

FACTUAL BACKGROUND

12. As part of its business, Plaintiff licenses its patents, including to Scuf Gaming and Microsoft Corporation.

13. Defendant is presently making, using, importing, marketing, selling, and/or offering to sell gaming controller products, including but not limited to Defendant’s Strike Pack product and Defendant’s Trigger Grips product¹, in this District and elsewhere in the United States, which products are intended to be used, per instructions that Defendant provides to its customers, to modify Microsoft Xbox One gaming controllers, with the result being that the modified Xbox One gaming controllers incorporate one or more of Plaintiff’s patented technologies.

¹ Pictures from Defendant’s website of Defendant’s Strike Pack product (<http://www.collectiveminds.ca/cm00030.html>) and of Defendant’s Trigger Grips product (<http://www.collectiveminds.ca/cm00090.html>), and which include instructions for using those products to modify Xbox One gaming controllers, are annexed hereto as **Exhibit F**.

14. At least as early as March 4, 2016, in written and oral communications with Collective Minds, Ironburg notified Collective Minds that its marketing of gaming controller products, including Collective Minds' Strike Pack product and Trigger Grips product, when used as intended to modify Xbox One gaming controllers, resulted in gaming controllers that infringed Ironburg's gaming controller patents. In those pre-suit communications with Collective Minds, Ironburg specifically identified various claims in patents and then-pending patent applications as being met by Xbox One gaming controllers modified with Collective Minds gaming controller products as follows:

- On March 4, 2016
 - Claim 20 of the '525 Patent (related to Collective Minds' Strike Pack)
 - Claim 1 of the '770 Patent (related to Collective Minds' Strike Pack)
 - Claim 1 of the then-pending patent application for the yet-to-be-issued '450 Patent (related to Collective Minds' Trigger Grips)
- On March 29, 2016
 - Claim 1 of the '688 Patent (related to Collective Minds' Strike

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.