

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VALVE CORPORATION

Petitioner,

v.

IRONBURG INVENTIONS LTD.,

Patent Owner.

Case IPR2016-00949

Patent 9,089,770

DECLARATION OF EHAB M. SAMUEL

IN SUPPORT OF THE PATENT OWNER RESPONSE

I, Ehab M. Samuel, make the following Declaration pursuant to 28 U.S.C.

1746:

1. I am an attorney with the law firm of Manatt, Phelps & Phillips, LLP, and counsel for Patent Owner Ironburg Inventions Ltd.

2. I provide this Declaration in connection with the Patent Owner Response in the above-identified *Inter Partes* Review proceeding requested at the United States Patent and Trademark Office by Valve Corporation. Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

3. Exhibit 2001 hereto is a true and correct copy of the prosecution history for U.S. Patent No. 8,541,525 entitled "CONTROLLER FOR VIDEO GAME CONSOLE." An exhibit label and page number have been added to the bottom of each page of this exhibit, but no other alterations have been made.

4. Exhibit 2003 hereto is a true and correct copy of Dr. Glen Stevick's Curriculum Vitae. An exhibit label and page number have been added to the bottom of each page of this exhibit, but no other alterations have been made.

5. Exhibit 2004 hereto is a true and correct copy of excerpts from Merriam-Webster's Collegiate Dictionary (10th ed. 1998). An exhibit label and page number have been added to the bottom of each page of this exhibit, but no other alterations have been made.

6. Exhibit 2005 hereto is a true and correct copy of excerpts from Webster's New American Dictionary (1995). An exhibit label and page number have been added to the bottom of each page of this exhibit, but no other alterations have been made.

7. Exhibit 2007 hereto is a true and correct copy of U.S. Patent No. 7,859,514 entitled "MULTI-FUNCTIONAL USER INTERFACE FOR ELECTRONIC DEVICES." An exhibit label and page number have been added to the bottom of each page of this exhibit, but no other alterations have been made.

8. Exhibit 2008 hereto is a true and correct copy of a printout of the LinkedIn webpage for Simon Burgess. An exhibit label and page number have been added to the bottom of each page of this exhibit, but no other alterations have been made.

9. Exhibit 2009 hereto is a true and correct copy of a printout of the LinkedIn webpage for Duncan Ironmonger. An exhibit label and page number have been added to the bottom of each page of this exhibit, but no other alterations have been made.

10. I understand that willful false statements and the like are punishable by fine or imprisonment, or both. I make this declaration of my own personal knowledge, and all statements are true. If called to testify as to the matters stated herein, I could and would testify competently.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 17th day of January, 2017, at Los Angeles, California.

/ Ehab M. Samuel /

Ehab M. Samuel