

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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VALVE CORPORATION,

Petitioner,

v.

IRONBURG INVENTIONS LTD.,

Patent Owner.

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Case IPR2016-00948

Patent 8,641,525

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**CORRECTED PETITION FOR *INTER PARTES* REVIEW OF U.S.  
PATENT NO. 8,641,525, UNDER 37 C.F.R. § 42.100**

In response to the requirement to correct, mailed by the Board on 2016-04-28, Petitioner respectfully submits this corrected petition for *inter partes* review of claims 1-20 (all the claims) of U.S. Patent No. 8,641,525 (hereinafter “the ’525 Patent” – Exhibit 1001). Petitioner certifies that this corrected petition includes no substantive changes (*e.g.*, no new grounds for challenge to any claim, nor any new support for any existing ground for challenge).

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**EXHIBIT LIST**

<b>Exhibit No.</b>	<b>Description</b>
1001	U.S. Patent 8,641,525 to Burgess et al.
1002	U.S. Patent 5,989,123 to Tosaki et al.
1003	U.S. Patent App. Pub. 2010/0073283 to Enright
1004	U.S. Patent App. Pub. 2001/0025778 to Ono
1005	“Rapid Fire Mod for Wireless Xbox 360 Controller, Step by Step Tutorial with Pictures,” posts 341-346 by Jimakos Sn, published 08 July 2008 at <a href="http://forums.xbox-scene.com/index.php?/topic/643928-rapid-fire-mod-for-wireless-xbox-360-controller/page-23">http://forums.xbox-scene.com/index.php?/topic/643928-rapid-fire-mod-for-wireless-xbox-360-controller/page-23</a> , as evidenced by the Internet Archive “Way Back Machine” on 07 November 2014, and at <a href="http://forums.xbox-scene.com/index.php?/topic/643928-rapid-fire-mod-for-wireless-xbox-360-controller/page-24">http://forums.xbox-scene.com/index.php?/topic/643928-rapid-fire-mod-for-wireless-xbox-360-controller/page-24</a> , as evidenced by the Internet Archive “Way Back Machine” on 08 November 2014.
1006	U.S. Patent 4,032,728 to Oelsch
1007	UK Search and Examination Report for Patent App. No. GB1011078.1, 16 May 2011, at 2.
1008	Expert Declaration of David Rempel, M.D., in Support of Valve Corporation’s Petition for Inter-Partes Review of U.S. Patent 8,641,525.
1009	Curriculum Vitae of David Rempel, M.D. (also denominated as Ex. 1 to Ex. 1008).
1010	Photo of the Wireless Xbox 360 Controller, published on 13 May 2005 at <a href="http://www.ign.com/articles/2005/05/13/xbox-360-wireless-controller-tour">http://www.ign.com/articles/2005/05/13/xbox-360-wireless-controller-tour</a> .

I. **MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(a)(1)**

The following mandatory notices are provided as part of this Petition.

A. **Real Parties-In-Interest Under 37 C.F.R. § 42.8(b)(1)**

Valve Corporation, having a business address at 10900 NE 4th Street, Bellevue, Washington 98004, USA, referred to herein as “Petitioner,” is the real party-in-interest for Petitioner.

B. **Related Matters Under 37 C.F.R. § 42.8(b)(2)**

On 2015-12-03, Ironburg Inventions Ltd., a U.K. Corporation, the purported assignee of the ’525 Patent, filed a complaint against the Petitioner for alleged infringement of the ’525 Patent in the U.S. District Court for the Northern District of Georgia (Case Docket No. 1:15-cv-04219-MHC).

Ironburg Inventions Ltd., a U.K. Corporation, the purported assignee of the ’525 Patent, and its purported licensee Scuf Gaming International LLC, a Georgia Corporation, also filed an earlier complaint against Playrapid Eurl, a French Corporation, for alleged infringement of the ’525 Patent in the U.S. District Court for the Northern District of Georgia (Case Docket No. 1:13-cv-03224-TWT).

Pending US Patent Application 14/754,789 and pending US Patent Application 14/754,793 claim priority to the ’525 Patent, through a chain of

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