

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VALVE CORPORATION,

Petitioner,

v.

IRONBURG INVENTIONS LTD.,

Patent Owner.

Case IPR2017-00136

Patent 8,641,525

Case IPR2017-00137

Patent 9,089,770

**DECLARATION OF NICOLETA COSEREANU IN SUPPORT OF
IRONBURG INVENTIONS LTD.'S PATENT OWNER RESPONSE**

I, Nicoleta Cosereanu, declare the following:

1. I make this declaration based on my own personal knowledge.
2. I am an employee of Scuf Gaming International LLC, my title is Finance Director, and I have been at Scuf Gaming International LLC since 2012.
3. Scuf Gaming International LLC is a licensee of the Ironburg Inventions, Ltd. patent portfolio, which includes U.S. Patent Nos. 8,641,525 and 9,089,770.
4. Scuf Gaming International LLC began marketing and offering for sale controller products with elongated back controls (“Scuf controller products”) in July 2011.
5. The first Scuf controller product offered in 2011 was the Scuf Controller for use with Xbox 360 and PC.
6. The Scuf controller product line has expanded to include the SCUF Hybrid and SCUF Infinity controllers, for use with Xbox 360 and PC, Xbox One, Playstation 3, and Playstation 4. All of these controllers have elongated back controls.
7. Current Scuf controller products may be found at www.scufgaming.com.
8. Scuf Gaming International LLC is a global leader and innovator in esports.
9. Over 90% of the top professional gamers in the world use Scuf controller products.

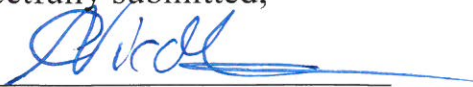
10. Scuf controller products allow a user to: (1) utilize more of their hands in games; (2) shorten their response time when performing actions; (3) access more activation points on paddles; and (4) avoid playing “CLAW” and reduce hand strain.
11. The elongated back controls on the back of Scuf controller products can be accessed across the length to suit all hand positions comfortably and ergonomically.
12. Scuf Gaming International LLC is the official controller partner of major gaming leagues, including CWL, MLG, ESL, UMG, Gfinity, and EGL.
13. Attached as **Exhibit 2010** is a true and correct copy of the “Scufology” page from Scuf Gaming International LLC’s website at <https://scufgaming.com/s/scufology/>.
14. As is shown in Exhibit 2010, the Scuf controller products are handheld video game controllers having a front, back, top, and bottom that have elongated back controls located on the back of the controller, where the elongated back controls extend substantially the full distance between the top edge and bottom edge of the controller, as in the claims of U.S. Patent No. 8,641,525, and at least half of a distance between the top and bottom of the controller, as in the claims of U.S. Patent No. 9,089,770.

15. Attached as **Exhibit 2011** is a true and correct copy of a press release by Scuf Gaming International LLC announcing its licensing agreement with Microsoft Corporation on October 15, 2015.

16. Prior to the license agreement with Microsoft, the Microsoft Xbox controllers had no back controls on the back of the controller.

Date: February 6, 2017

Respectfully submitted,

By: 
Nicoleta Cosereanu

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