

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

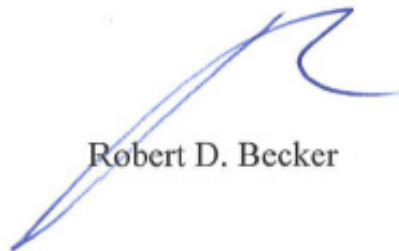
DECLARATION OF ROBERT BECKER

I, Robert Becker, hereby declare as follows:

1. I am an attorney representing Ironburg Inventions, Ltd. (“Ironburg”) on various district court and other matters.
2. I make this declaration bases on my own personal knowledge.
3. Attached hereto as **Appendix A** is a true and correct copy of the letter, claim chart, and copy of U.S. Patent No. 9,352,229 that was sent to Valve’s counsel on June 13, 2016.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on : November 23, 2016



Robert D. Becker

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e) and 42.105(b), the undersigned certifies that on November 23, 2016, a complete and entire electronic copy of this DECLARATION OF ROBERT BECKER, was served via email to Petitioner's counsel of record at the following address:

Joshua C. Harrison, Reg. No. 45,686, josh@bhiplaw.com
Reynaldo C. Barcelo, Reg. No. 42,290, rey@bhiplaw.com

Date: November 23, 2016

Respectfully submitted,

By: /s/ Ehab Samuel
Ehab Samuel
Attorney for Patent Owner
Reg. No. 57,905

Danielle Mihalkanin
Attorney for Patent Owner
Reg. No. 69,506

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APPENDIX A

June 13, 2016

VIA MAIL AND E-MAIL

Patrick A. Lujin
Shook, Hardy & Bacon LLP
2555 Grand Blvd
Kansas City, MO 64108
PLUJIN@shb.com
Attorney for Valve Corporation

Re: Infringement of U.S. Patent No. 9,352,229

Dear Mr. Lujin:

As you know, we represent Ironburg Inventions, an IP Company that licenses gaming technology to Scuf Gaming, which makes and sells tactical gear for elite gamers.

In prior correspondence with and in the pending litigation against your client Valve Corporation, Ironburg has:

(i) identified its ownership of patents and pending patent applications directed to gaming controllers, including now issued U.S. Patent Nos. 8,641,525 (the '525 patent) issued on 4 February 2014; 9,089,770 (the '770 patent) issued on 28 July 2015; and 9,289,688 (the '688 patent) issued on 22 March 2016; and

(ii) notified Valve that certain game controllers sold by Valve, including the Steam Controller, infringe the above-identified patents.

Despite multiple notifications of infringement, it is our understanding that Valve continues to make, market and/or sell infringing Valve controllers. We are writing today to notify Valve that it is also infringing U.S. Patent No. 9,352,229 (the '229 Patent) issued on 31 May 2016. More specifically, Valve continues to make, market and sell certain game controllers, including the Steam Controller, that incorporate inventions set forth in one or more claims of the '229 patent. Infringement of Claim 3 is illustrative of Valve's infringement.

Claim 3 of the '229 patent, which depends on Claim 1, provides the following:

1. A hand held controller for a games console comprising:

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