

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

IRONBURG INVENTIONS LTD.

*Plaintiff,*

v.

COLLECTIVE MINDS GAMING  
CO. LTD.

*Defendant.*

Civil Action No. 1:16-cv-04110-TWT

**DEFENDANT COLLECTIVE MINDS GAMING CO. LTD.’S  
RESPONSE TO INFRINGEMENT CONTENTIONS AND  
INITIAL INVALIDITY CONTENTIONS**

Pursuant to Local Patent Rules 4.2 and 4.3, Defendant Collective Minds Gaming Co. Ltd. (“Collective Minds”) herein provides its Response to Infringement Contentions and Preliminary Invalidity Contentions to Plaintiff Ironburg Inventions Ltd. (“Ironburg”). Discovery is ongoing and Collective Minds’ investigation in connection with this action is continuing. Thus, Collective Minds’ disclosures are based upon information obtained to date. To the extent that Collective Minds obtains additional information, Collective Minds reserves the right to supplement and/or amend these Invalidity Contentions.

## A. The '525 Patent

Collective Minds identifies the following prior art references that anticipate or render obvious all asserted claims of the '525 patent.

<b>Prior Art</b>
U.S. Patent Publication No. 2010/0073283 filed by Robert Enright; published on March 25, 2010 ("Enright").
U.S. Patent Publication No. 2010/0298053 filed by David Kotkin; published on November 25, 2010 ("Kotkin").
Japanese Patent JPH1020951 issued to Koji; published in 1998 ("Koji").
U.S. Patent No. 5,989,123 issued to Kenji Tosaki et al.; issued November 23, 1999 ("Tosaki").
U.S. Patent Publication No. 2001/0025778 filed by Atsushi Ono; published on October 4, 2001 ("Ono").
U.S. Patent No. 6,153,843 issued to Toshinori Date et al.; issued on November 28, 2000 ("Date").
U.S. Patent No. 6,362,813 issued to Heinz Worn et al.; issued on March 26, 2002 ("Worn").
U.S. Patent No. 6,364,771 issued to Sam Y. Lee; issued on April 2, 2002 ("Lee").
U.S. Patent No. 6,760,013 issued to Michael A. Willner; issued on July 6, 2004 ("Willner").
U.S. Patent Publication No. 2002/0128064 filed by John F. Sobata; published on September 12, 2002 ("Sobata").
U.S. Patent No. 5,773,769 issued to Christopher W. Raymond; issued on June 30, 1998 ("Raymond").
U.S. Patent Publication No. 2008/0261695 filed by Adam Wesley Coe; published on October 23, 2008 ("Coe").
"Rapid Fire Mod for Wireless Xbox 360 Controller, Step by Step Tutorial with Pictures" posts 341 – 346 by Jimakos Sn, published on July 9, 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> and also /page-24 ("Jimakos").

**B. The '770 Patent**

Collective Minds identifies the following prior art references that anticipate or render obvious all asserted claims of the '770 patent.

<u>Prior Art</u>
Enright
Kotkin
Koji
Tosaki
Ono
Worn
Date
Lee
Willner
Sobata
Coe
Jimakos

**C. The '688 Patent**

Collective Minds identifies the following prior art references that anticipate or render obvious all asserted claims of the '688 patent.

<u>Prior Art</u>
Willner
Kotkin
Koji
Tosaki
Ono
Worn
Date
Lee

anything resembling a “channel.” By over-extending the scope of this term through their allegations well beyond that supported by the intrinsic record, all claims within which this phrase appears is invalid for failing to satisfy the written description requirement.

Ironburg has mapped the phrase “command initiation point” from the asserted claims of the ‘450 Patent in an ambiguous manner that appears to be entirely at odds with the meaning of this phrase in the intrinsic record. To the extent Ironburg’s allegations map the “command initiation point” to the resting or un-actuated position of the trigger controls with the accused Trigger Grips installed, this phrase (and all claims within which is appears) is invalid for failing to satisfy the written description requirement.

**VI. Local Patent Rule 4.3(b)**

**A. Documents Related to Prior Art Under LPR 4.3(b)**

Based on its investigations to date, pursuant to LPR 4.3(b), Collective Minds has produced or is producing documents currently within its possession, custody, or control that are the prior art references identified above and/or in the attached charts in connection with Collective Minds’ LPR 4.3(a) disclosure.

Dated: July 10, 2017

Respectfully submitted,

ERISE IP, P.A.

/s/ Paul R. Hart

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