

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

IRONBURG INVENTIONS LTD. a  
United Kingdom Limited Company,

Plaintiff,

vs.

COLLECTIVE MINDS GAMING  
CO. LTD.,

Defendant.

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

**PLAINTIFF IRONBURG INVENTIONS LTD PRELIMINARY  
INFRINGEMENT CONTENTIONS AGAINST DEFENDANT  
COLLECTIVE MINDS GAMING CO., LTD.**

Pursuant to Scheduling Order (D.I. 28) and L.P.R. 4.1 and 4.4(a) Plaintiff Ironburg Inventions Ltd. (“Ironburg” or “Plaintiff”), by and through its counsel, hereby submits the following Preliminary and Exemplary Infringement Contentions against Defendant Collective Minds Gaming Co. LTD (“Collective Minds” or “Defendant”).

Plaintiff reserves the right to supplement these Infringement Contentions, including the list of accused products, based upon further discovery. Further, Plaintiff may amend or supplement any of these disclosures and contentions in view of any claim construction ruling(s) by the Court or any position taken by Collective Minds in this action. Plaintiff therefore expressly reserves the right to amend or to supplement its identification of asserted claims and accused devices, as well as its claim charts, based on further investigation and discovery.

**(1) Each claim of each patent in suit that is allegedly infringed by each party.**

The following table sets forth the claims alleged to be infringed by Collective Minds. Each patent is alleged to be infringed under 35 U.S.C. § 271(a) and (b):

Patent	Asserted Claims
U.S. Patent No. 8,641,525	1-11, 13-20
U.S. Patent No. 9,089,770	1-20

U.S. Patent No. 9,289,688	1, 9-10, 18-19, 21-24, 26, 28-30
U.S. Patent No. 9,352,229	1-2, 9-10, 15-18, 21-24
U.S. Patent No. 9,308,450	1, 10-15, 20

Plaintiff asserts that all elements of all claims listed above are literally present and also by equivalents.

**(2) Each accused apparatus, method, composition or other instrumentality (“Accused Device”) corresponding to each claim**

Each of the asserted claims in the table of section (1), above, is being asserted against the products, namely Collective Minds Strike Pack controller, Strike Pack, Strike Pack F.P.S. Dominator and Trigger Grips.

Charts identifying specifically where each element of each asserted claim is found within each Accused Device, including for each element that such party contends is governed by 35 U.S.C. § 112(6), the identity of the structure(s), act(s), or material(s) in the Accused Device that performs the claimed function, and whether each element of each asserted claim is to be literally present, present under the doctrine of equivalents, or both, in the Accused Device, are attached hereto as follows:

- U.S. Patent No. 8,641,525 – Appendix A
- U.S. Patent No. 9,089,770 – Appendix B
- U.S. Patent No. 9,289,688 – Appendix C

- U.S. Patent No. 9,352,229 – Appendix D
- U.S. Patent No. 9,308,450 – Appendix E

**(3) Priority dates of patents claiming priority to an earlier application**

U.S. Patent No. 9,089,770 claims priority to U.S. Patent No. 8,641,525, which has a filing date of June 17, 2011. Claims 1-20 of U.S. Patent No. 9,089,770 have a priority date of June 17, 2011.

U.S. Patent No. 9,289,688 claims priority to International Application No. PCT/EP2015/058096, which claims priority to Provisional Application No. 61/979,124. Provisional Application No. 61/979,124 was filed on April 14, 2014. Claims 1-30 of U.S. Patent No. 9,289,688 have a priority date of April 14, 2014. There are no foreign applications that also claim priority to International Application No. PCT/EP2015/058096.

U.S. Patent No. 9,352,229 claims priority to International Application No. PCT/EP2014/060587, which claims priority to Provisional Application No. 61/882,171 and Provisional Application No. 61/826087. Provisional Application No. 61/882,171 was filed on September 25, 2013. Provisional Application No. 61/826,087 was filed on May 22, 2013. Claims 1-24 of U.S. Patent No. 9,352,229 have a priority date of May 22, 2013. The following foreign applications claim priority to International Application No. PCT/EP2014/060587: CA2913093 (A1), CN105492090 (A), and EP2888017 (A1).

U.S. Patent No. 9,308,450 claims priority to U.S. Patent No. 8,480,491, which has a filing date of June 17, 2011. Claims 1-20 of U.S. Patent No. 9,308,450 have a priority date of June 17, 2011.

**(4) Production or availability of documents**

Other than the documents produced concurrently with these Preliminary Infringement Contentions, documents will be made available at counsel's office at a mutually convenient time or produced after the parties agree on a protocol for the production of documents (or the court enters an order if the parties do not agree).

Dated: June 8, 2017

Respectfully submitted,

By: /s/ Robert D. Becker

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