

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

INTEL CORPORATION  
Petitioner

v.

ZOND, LLC  
Patent Owner

U.S. Patent No. 7,147,759

---

*Inter Partes* Review Case No. 2014-00446

---

**PATENT OWNER MANDATORY NOTICE INFORMATION  
UNDER 37 CFR § 42.8(a)(2)**

**I. REAL PARTY-IN-INTEREST**

1. The real party-in-interest is Zond, LLC (Patent Owner), the sole owner of U.S. Patent No. 7,147,759 ('759 patent). Patent Owner's address is 20 Cabot Boulevard, Ste. 300, Mansfield, MA 02048 USA.

**II. RELATED MATTERS**

2. The '759 patent has been asserted in seven patent infringement actions pending in the District of Massachusetts: 1:13-cv-11570-RGS (*Zond v. Intel Corp.*); 1:13-cv-11577-DPW (*Zond v. AMD, Inc., GlobalFoundries U.S., Inc., et al.*); 1:13-cv-11581-DJC (*Zond v. Toshiba Am. Elec. Comp. Inc., et al.*); 1:13-cv-11591-RGS (*Zond v. SK Hynix, Inc., et al.*); 1:13-cv-11625-NMG (*Zond v. Renesas Elec. Corp., et al.*); 1:13-cv-11634-WGY (*Zond v. Fujitsu Semiconductor Ltd., Taiwan Semiconductor Manufacturing Company, Ltd., et al.*); and 1:13-cv-11567-DJC (*Zond v. The Gillette Co. and The Procter & Gamble Co.*). In addition, Zond understands that Wilmer Hale (for at least Intel and Gillette) has, to date, filed a total of 12 *Inter Partes* Review Petitions relating to either the '759 patent or three other patents (U.S. Patent Nos. 7,808,184; 7,811,421; and 8,125,155) related to the '759 patent. A table identifying these 12 petitions is as follows:

IPR Trial No.	Patent No.	Claims	Petitioner
2014-00443	7,147,759	1, 4, 10-12, 17, 18, 44	Intel

IPR Trial No.	Patent No.	Claims	Petitioner
2014-00444	7,147,759	2, 3, 5-9, 13-16, 19, 41-43, 45	Intel
2014-00445	7,147,759	20, 21, 34-36, 38, 39, 47, 49	Intel
2014-00446	7,147,759	22-33, 37, 46, 48, 50	Intel
2014-00447	7,147,759	40	Intel
2014-00455	7,808,184	1-5, 11-15	Intel
2014-00456	7,808,184	6-10, 16-20	Intel
2014-00468	7,811,421	1, 2, 8, 10-13, 15-17, 22-25, 27-30, 33, 34, 38, 39, 42, 43, 46-48	Intel
2014-00470	7,811,421	9, 14, 21, 26, 35, 37	Intel
2014-00473	7,811,421	3-7, 18-20, 31, 32, 36, 40, 41, 44, 45	Intel
2014-00477	8,125,155	1-16	Gillette
2014-00479	8,125,155	17-19	Gillette

In addition, Wilmer Hale has informed Zond that it intends to file additional *Inter Partes* Review Petitions on 6 additional patents related to the '759 patent, which have been asserted in the above District Court actions.

### III. LEAD AND BACK-UP COUNSEL

3. Lead Counsel:

David C. Radulescu, Ph.D.  
Radulescu LLP  
136 Madison Avenue, 6<sup>th</sup> Floor  
New York, NY 10016  
Tel: (646) 502-5950  
Fax: (646) 502-5959  
Email: [david@radulescullp.com](mailto:david@radulescullp.com)  
Registration Number: 36,250

4. Back-up Counsel:

Kurt Rauschenbach, Ph.D.  
Rauschenbach Patent Law Group, PLLC  
PO Box 849

Franconia, NH 03580  
Tel: (603) 823-5590  
Fax: (603) 823-5706  
Email: [kurt@rauschenbach.com](mailto:kurt@rauschenbach.com)  
Registration Number: 40,137

**IV. SERVICE INFORMATION**

5. Patent Owner agrees to service by email to all of the following email addresses:

[david@radulescullp.com](mailto:david@radulescullp.com)  
[kurt@rauschenbach.com](mailto:kurt@rauschenbach.com)  
[zondservice@radulescullp.com](mailto:zondservice@radulescullp.com)

Service on Patent Owner may be made by Postal Mailing to the following address, but electronic service above is requested:

**Radulescu LLP**  
136 Madison Avenue, 6<sup>th</sup> Floor  
New York, NY 10016  
David C. Radulescu, Ph.D.

**V. PATENT OWNER PRELIMINARY RESPONSE**

6. Patent Owner reserves the right to file a preliminary response at a later date.

Date: March 13, 2014

Respectfully submitted,

/s/ David C. Radulescu  
David C. Radulescu  
Registration No. 36,250

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Patent Owner Mandatory Notice Information Under 37 CFR § 42.8(a)(2) and the associated Power of Attorney documents were served via EXPRESS MAIL<sup>®</sup>, postage prepaid on March 13, 2014, on the attorneys for the Petitioner:

David Cavanaugh  
Richard Goldenberg  
Wilmer, Cutler, Pickering, Hale and Dorr, LLP  
1875 Pennsylvania Ave., NW  
Washington, DC 2006  
Tel: (202) 663-6000  
Fax: (202) 663-6363  
Email: [david.cavanaugh@wilmerhale.com](mailto:david.cavanaugh@wilmerhale.com)  
Email: [richard.goldenberg@wilmerhale.com](mailto:richard.goldenberg@wilmerhale.com)

/s/ David C. Radulescu  
David C. Radulescu  
Registration No. 36,250