Patent No. 7,811,421 IPR2014-00468

### 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. 7,811,421

Inter Partes Review Case No. 2014-00468

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

### I. <u>REAL PARTY-IN-INTEREST</u>

1. The real party-in-interest is Zond, LLC (Patent Owner), the sole owner of U.S. Patent No. 7,811,421 ('421 patent). Patent Owner's address is 20 Cabot Boulevard, Ste. 300, Mansfield, MA 02048 USA.

### II. <u>RELATED MATTERS</u>

The '421 patent has been asserted in seven patent infringement actions 2. 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 17 Inter Partes Review Petitions relating to either the '421 patent or four other patents (U.S. Patent Nos. 7,147,759; 7,808,184; 8,125,155; and 6,853,142) related to the '421 patent. A table identifying these 17 petitions is as follows:

IPR Trial No.	Patent No.	Claims	Petitioner
2014-00443	7,147,759	1, 4, 10-12, 17, 18, 44	Intel
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
2014-00494	6,853,142	1, 3-10, 12, 15, 17-20, 42	Intel
2014-00495	6,853,142	2, 11, 13, 14, 16	Intel
2014-00496	6,853,142	21, 24, 26-28, 31, 32, 37, 38	Intel
2014-00497	6,853,142	22, 23, 25, 29, 30, 33-36, 39, 43	Intel
2014-00498	6,853,142	40, 41	Intel

In addition, Wilmer Hale has informed Zond that it intends to file additional

Inter Partes Review Petitions on 5 additional patents related to the '421 patent,

which have been asserted in the above District court actions.

## III. LEAD AND BACK-UP COUNSEL

3. Lead Counsel:

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## IV. SERVICE INFORMATION

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

addresses:

david@radulescullp.com kurt@rauschenbach.com 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. <u>PATENT OWNER PRELIMINARY RESPONSE</u>

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

date.

Patent No. 7,811,421 IPR2014-00468

Date: March 21, 2014

Respectfully submitted,

/s/ *David C. Radulescu* David C. Radulescu

Registration No. 36,250

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