

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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INTEL CORPORATION  
Petitioner

v.

ZOND, LLC  
Patent Owner

U.S. Patent No. 7,811,421

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*Inter Partes* Review Case No. 2014-00470

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**PATENT OWNER'S PRELIMINARY RESPONSE  
UNDER 37 CFR § 42.107(a)**

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## I. Introduction

The present petition is the second of three petitions filed by Intel Inc. for *inter partes* review of U.S. Patent No. 7,811,421 (“the ‘421 patent”). The first (IPR 2014-00468) seeks cancellation of all independent claims (1, 17, 34, 46, 47, and 48), and selected dependent claims. This second petition seeks cancellation of six dependent claims (9, 14, 21, 26, 35, and 37), and a third petition (IPR 2014- 00474) seeks cancellation of the remainder.

This second petition relies on the same arguments and evidence presented against the parent claims in IPR 2014-00468, but adds new arguments and evidence directed to the dependent claims. Therefore, this second petition should be categorically denied for the exact same reasons given by the Patent Owner in response to IPR 2014-00468, which are repeated here,<sup>1</sup> but with some supplementary arguments. Furthermore, as explained below, the dependent claims specifically addressed in the present petition are even less likely to be found un-patentable and therefore the Petition does not justify review.

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<sup>1</sup> Rule §46.6 prohibits incorporation by reference of the Patent Owner’s response from IPR 2014-000455.

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