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Filed on behalf of Intel Corporation

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION
Petitioner

v.

ZOND, INC.
Patent Owner

IPR Trial No. TBD

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 7,811,421
CHALLENGING CLAIMS 3-7, 18-20, 31, 32, 36, 40, 41, 44 and 45
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

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TABLE OF AUTHORITIES

In re ICON Health & Fitness, Inc., 496 F.3d 1374, 1379 (Fed. Cir. 2007).

37 C.F.R. §42.22(a)(1)

37 C.F.R. § 42.100(b)

37 C.F.R. §42.104(a)

37 C.F.R. §42.104(b)(1)-(5)

77 Fed. Reg. 48764 (Aug. 14, 2012).

I. MANDATORY NOTICES

A. Real Party-in-Interest

Intel Corporation (“Petitioner”) is the real party-in-interest.

B. Related Matters

Zond has asserted U.S. Patent No. 7,811,421 (“’421 Patent”) (Ex. 1101) against numerous parties in the District of Massachusetts, 1:13-cv-11570-RGS (*Zond v. Intel*); 1:13-cv-11577-DPW (*Zond v. AMD, Inc., et al*); 1:13-cv-11581-DJC (*Zond v. Toshiba Am. Elec. Comp. Inc.*); 1:13-cv-11591-RGS (*Zond v. SK Hynix, Inc.*); 1:13-cv-11625-NMG (*Zond v. Renesas Elec. Corp.*); 1:13-cv-11634-WGY (*Zond v. Fujitsu, et al.*); and 1:13-cv-11567-DJC (*Zond v. Gillette, Co.*). Petitioner is also filing additional Petitions for *Inter Partes* review in several patents related¹ to the ’421 Patent.

C. Counsel

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¹ The related patents, e.g., name the same alleged inventor.

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