

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

THE GILLETTE COMPANY, TAIWAN SEMICONDUCTOR  
MANUFACTURING COMPANY, LTD., TSMC NORTH AMERICA CORP.,  
FUJITSU SEMICONDUCTOR LIMITED, and FUJITSU SEMICONDUCTOR  
AMERICA, INC.

Petitioners

v.

ZOND, LLC  
Patent Owner

---

Case IPR2014-00578<sup>1</sup>  
Patent 6,896,775 B2

---

JOINT REQUEST TO MAINTAIN CONFIDENTIALITY  
AND TO KEEP SEPARATE  
PURSUANT TO 35 U.S.C. § 327(b) AND 37 C.F.R. § 42.74

---

<sup>1</sup> Case IPR2014-01494 has been joined with the instant proceeding.

## **I. INTRODUCTION**

ZOND LLC (“Patent Owner”) and Petitioners TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD. and TSMC NORTH AMERICA CORP (jointly, “TSMC”) (collectively, “the Parties” or “Petitioner”) have executed a Settlement Agreement regarding U.S. Patent No. 6,896,775. Pursuant to 35 U.S.C. § 327(b), the Parties jointly request that the Board treat the Settlement Agreement as business confidential information and keep it separate from the file of the involved patent.

## **II. STATEMENT OF PRECISE RELIEF REQUESTED**

The Parties jointly request that the Board treat the Settlement Agreement (Exhibit 2011) as business confidential information and keep it separate from the file of the involved patent. The Parties further request the Board to not make the Settlement Agreement available to any third-party, except as provided for in 35 U.S.C. § 327(b) and 37 C.F.R. § 42.74.

## **III. STATEMENT OF REASONS FOR THE RELIEF REQUESTED**

The Parties have settled all of their disputes involving U.S. Patents Nos. 6,805,779 (the “779 patent”), 6,806,652 (the “652 patent”), 6,853,142 (the “142 patent”), 6,896,773 (the “773 patent”), 6,896,775 (the “775 patent”), 7,147,759 (the “759 patent”), 7,604,716 (the “716 patent”), 7,808,184 (the “184 patent”),

IPR2014-00578  
U.S. Patent No. 6,896,775

JOINT REQUEST TO MAINTAIN CONFIDENTIALITY  
AND TO KEEP SEPARATE

and 7,811,421 B2 (the “421 patent”) (collectively, the “Patents”). The Settlement Agreement provides that its terms are confidential and the Parties have treated them as such. The Parties have filed, concurrently herewith, a true and correct copy of the Settlement Agreement (Exhibit 2013), as required by 35 U.S.C. § 327(b) and 37 C.F.R. § 42.74. The Exhibit was filed via the PRPS system to provide availability to “Board Only.” The Parties jointly request that the Settlement Agreement be treated as business confidential information and be kept separate from the file of the involved patent, pursuant to 35 U.S.C. § 327(b) and 37 C.F.R. § 42.74(c).

For Patent Owner:  
ZOND, LLC

For Petitioner:  
TAIWAN SEMICONDUCTOR  
MANUFACTURING COMPANY LTD,  
and TSMC NORTH AMERICA CORP.

/Gregory J. Gonsalves/  
Dr. Gregory J. Gonsalves  
Reg. No. 43,639  
2216 Beacon Lane  
Falls Church, Virginia 22043  
gonsalves@gonsalveslawfirm.com

/David L. McCombs/  
David L. McCombs, Reg. No. 32,271  
David M. O’Dell, Reg. No. 42,044  
Haynes and Boone, LLP  
2323 Victory Avenue, Suite 700  
Dallas, TX 75219  
david.mccombs.ipr@haynesboone.com;  
david.odell.ipr@haynesboone.com

Dated: March 10, 2015

IPR2014-00578  
U.S. Patent No. 6,896,775  
JOINT REQUEST TO MAINTAIN CONFIDENTIALITY  
AND TO KEEP SEPARATE

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), this is to certify that I caused to be served a true and correct copy of the foregoing “JOINT REQUEST TO MAINTAIN CONFIDENTIALITY AND TO KEEP SEPARATE PURSUANT TO 35 U.S.C. § 327(b) AND 37 C.F.R. § 42.74” as detailed below:

*Date of service* March 10, 2015

*Manner of service* email

*Documents served* JOINT REQUEST TO MAINTAIN CONFIDENTIALITY AND TO KEEP SEPARATE PURSUANT TO 35 U.S.C. § 327(b) AND 37 C.F.R. § 42.74

*Persons Served*

David L. McCombs  
HAYNES AND BOONE, LLP  
2323 Victory Ave. Suite 700  
Dallas, TX 75219  
david.mccombs.ipr@haynesboone.com  
USPTO Reg. No. 32,271

David O’Dell  
HAYNES AND BOONE, LLP  
2323 Victory Ave. Suite 700  
Dallas, TX 75219  
david.odell.ipr@haynesboone.com  
USPTO Reg. No. 42,044

/Gregory J. Gonsalves/  
Gregory J. Gonsalves, Reg. No. 43,639