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UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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THE GILLETTE COMPANY  
Petitioner

v.

Patent Owner of  
U.S. Patent No. 6,896,775 to Roman Chistyakov

IPR Trial No. IPR2014-00578

**CORRECTED PETITION FOR *INTER PARTES* REVIEW OF  
U.S. PATENT NO. 6,896,775  
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

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## **I. MANDATORY NOTICES**

### **A. Real Party-in-Interest**

The Gillette Company (“Petitioner”), a wholly-owned subsidiary of the Procter & Gamble Co., is the real party-in-interest.

### **B. Related Matters**

*Zond, Inc. v. The Gillette Co. and The Procter and Gamble Co.*, Civil Action No. 1:13-CV. 11567-DJC (D. Mass. 2013) would affect or be affected by a decision in the proceeding. Additionally, the Patent Owner is suing various parties under one or more of U.S. Patent Nos. 8,125,155, 7,147,759; 6,896,775; 6,853,142; 7,604,716; 6,896,773; 7,811,421; 6,805,779; 7,808,184; and 6,806,652, all of which have generally similar subject matter. A separate *Inter Partes* review petition is being filed to address claims 30-37 of the ‘775 Patent. Additionally, the Petitioner previously filed two petitions related to the United States Patent No. 8,125,155 (IPR Nos. 2014-00477 and 2014-00479) and is filing additional petitions for Inter Partes Review for U.S. Patent No. 6,896,773.

### **C. Counsel**

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## II. CERTIFICATION OF GROUNDS FOR STANDING

Petitioner certifies pursuant to Rule 42.104(a) that the patent for which review is sought is available for *inter partes* review and that Petitioner is not barred or estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in this Petition.

## III. OVERVIEW OF CHALLENGE AND RELIEF REQUESTED

Pursuant to Rules 42.22(a)(1) and 42.104(b)(1)-(2), Petitioner challenges claims 1-29 of U.S. Patent No. 6,896,775 (the '775 Patent) (Ex. 1001).

### A. Prior Art Patents and Printed Publications

The following references and others in the Table of Exhibits are pertinent to the grounds of unpatentability explained below:

1. D.V. Mozgrin, *et al.*, High-Current Low-Pressure Quasi-Stationary Discharge in a Magnetic Field: Experimental Research, Plasma Physics Reports, Vol. 21, No. 5, 1995 (“Mozgrin” (Ex. 1002)), which is prior art under §102(b).

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