

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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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

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*Inter Partes* Review Case No. IPR2014-00578

Patent 6,896,775 B2

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**PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION  
PURSUANT TO 37 C.F.R. § 42.10(c)**

This Motion for *Pro Hac Vice* admission is filed on behalf of Zond, LLC (“Zond” or “Patent Owner”). Zond respectfully moves that the Board recognize Dr. Maria Granovsky as counsel *pro hac vice* during this proceeding.

**1. Time for Filing**

This Motion for *Pro Hac Vice* Admission is being filed no sooner than

twenty-one (21) days after service of the petition. *See Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper No. 7.

## **2. Statement of Facts Showing Good Cause for Admission of Counsel**

### ***Pro Hac Vice***

Petitioner has been authorized to file motions seeking admission *pro hac vice* under 37 C.F.R. 42.10(c). (Paper No. 4). Petitioner's lead and back-up counsel are registered practitioners:

Lead Counsel: Bruce Barker, USPTO Reg. No. 33,291; and

Backup Counsel: Dr. Gregory J. Gonsalves, USPTO Reg. No. 43,639.

Dr. Granovsky is a skilled litigator, has extensively participated in co-pending litigation in federal district court involving the subject matter of the patent at issue in this proceeding, and if admitted, will be involved with the depositions that occur in this proceeding. Dr. Granovsky is familiar with the subject matter, claim construction, and prior art at issue in this proceeding as a result of her representation of Zond, LLC, in litigation in which the patents 6896775, 6896773, 6806651, 6903511, 7095179, and 7446479 have been asserted against several TSMC and Fujitsu entities. *Zond v. TSMC, et al.*, No. 1:14-cv-12438-WGY, D. Mass. Dr. Granovsky is a member of the New York and Delaware bars in good standing, and is representing the Patent Owner in the co-pending litigation.

Dr. Granovsky has analyzed the prior art references and invalidity arguments and is familiar with the claim construction positions of the petitioners and Zond, all of which are relevant to the petition requesting *inter partes* review of U.S. Patent No. 6,896,775. Patent Owner wishes to apply Dr. Granovsky's knowledge of the subject matter of this proceeding and related district court litigation by employing her as counsel. Admission of Dr. Granovsky *pro hac vice* will enable Patent Owner to avoid unnecessary expense and duplication of work between this proceeding and the co-pending litigation.

Patent Owner's lead and backup counsel are registered practitioners and Dr. Granovsky is an experienced litigation attorney having familiarity with the subject matter at issue in this proceeding. Therefore, Patent Owner respectfully submits that there is good cause for the Board to recognize Dr. Granovsky as counsel *pro hac vice* during this proceeding.

### 3. Affidavit of Individual Seeking to Appear

This Motion for *Pro Hac Vice* Admission is supported by an Affidavit of Dr. Granovsky (Ex. 2002).

Date: November 11, 2014

Respectfully submitted,

/Mr. Bruce Barker/  
Mr. Bruce Barker  
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Counsel for Patent Owner Zond, LLC

**PATENT OWNER'S EXHIBIT LIST IPR 2014-00578**

<b>Exhibit No.</b>	<b>Description</b>
Ex. 2001	Affidavit of Etai Lahav
Ex. 2002	Affidavit of Maria Granovsky

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