

THE GILLETTE COMPANY

Petitioner

V.

ZOND, LLC

Patent Owner

Inter Partes Review Case No. IPR2014-00578
Patent 6,896,775

MOTION TO EXPUNGE

Zond, LLC ("Patent Owner") respectfully moves to expunge from the record its motions to admit Etai Lahav and Maria Granovsky *pro hac vice* (Paper Nos. 18, 19) and supporting affidavits (nos. 20, 21) in IPR2014-00578 concerning U.S. Patent No. 6,896,775 (the '755 patent). The motions and supporting affidavits were filed on the evening of November 10, 2014. Counsel for Patent Owner recently realized that the papers were not the completed versions but instead drafts, and diligently filed corrected motions for admission *pro hac vice* (Paper Nos. 24,



25) and supporting exhibits. Counsel for Petitioners do not oppose Patent Owner's Motion to Expunge Paper Nos. 18, 19, 20, and 21 filed in error.

Respectfully submitted,

Mr. Bruce Barker/

Mr. Bruce Barker Reg. No. 33,291 176 East Main Street, Suite 6 Westborough, MA 01581 (508) 366-3800 bbarker@chsblaw.com

Counsel for Patent Owner Zond, LLC



CERTIFICATE OF SERVICE

I certify that the foregoing Motion was served on the Petitioners by email to the following email addresses on November 11, 2014.

michael.diener@wilmerhale.com larissa.park@wilmerhale.com david.odell.ipr@haynesboone.com david.mccombs.ipr@haynesboone.com

/Bruce Barker/
Bruce Barker

Reg. No. 33,291 Chao Hadidi Stark & Barker LLP 176 East Main Street, Suite 6 Westborough, MA 01581 (508) 366-3800 bbarker@chsblaw.com

