

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.,  
TSMC NORTH AMERICA CORPORATION,  
FUJITSU SEMICONDUCTOR LIMITED,  
FUJITSU SEMICONDUCTOR AMERICA, INC.,  
ADVANCED MICRO DEVICES, INC., RENESAS ELECTRONICS  
CORPORATION, RENESAS ELECTRONICS AMERICA, INC.,  
GLOBALFOUNDRIES U.S., INC., GLOBALFOUNDRIES DRESDEN  
MODULE ONE LLC & CO. KG, GLOBALFOUNDRIES DRESDEN  
MODULE TWO LLC & CO. KG, TOSHIBA AMERICA ELECTRONIC  
COMPONENTS, INC., TOSHIBA AMERICA INC., TOSHIBA  
AMERICA INFORMATION SYSTEMS, INC.,  
TOSHIBA CORPORATION, and  
THE GILLETTE COMPANY,  
Petitioners,

v.

ZOND, LLC  
Patent Owner

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Case IPR2014-00781<sup>1</sup>  
Patent 7,147,759 B2

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

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<sup>1</sup> Cases IPR 2014-00845, IPR 2014-00985, and IPR 2014-01047 have 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. 7,147,759. 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 1238) 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”),

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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 1238), 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).

Respectfully submitted,

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

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**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 11, 2015

*Manner of service* Email: gonsalves@gonsalveslawfirm.com;  
bbarker@chsblaw.com;

*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* Dr. Gregory J. Gonsalves  
2216 Beacon Lane  
Falls Church, Virginia 22043

Bruce Barker  
Chao Hadidi Stark & Barker LLP  
176 East Mail Street, Suite 6  
Westborough, MA 01581

/David L. McCombs/  
David L. McCombs  
Lead Counsel for Petitioner TSMC  
Registration No. 32,271