

Paper No. _____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioner

v.

ZOND, INC.
Patent Owner

Case IPR2014-00781

U.S. PATENT NO. 7,147,759
CLAIMS 20, 21, 34-36, 38, 39, 47 AND 49

UPDATED MANDATORY NOTICE BY PETITIONER
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. §§ 42.8, 42.100 *ET. SEQ.*

Petitioner updates the following mandatory disclosures, pursuant to 37 C.F.R. §42.8, to add TSMC North America Corp. as a real party-in-interest. No other sections are changed.

REAL PARTY-IN-INTEREST

Taiwan Semiconductor Manufacturing Company, Ltd. and TSMC North America Corp. are the real parties-in-interest.

RELATED MATTERS

This section has not changed.

Zond has asserted U.S. Patent No. 7,147,759 (“’759 Patent”) against numerous parties in the District of Massachusetts, 1:13-cv-11570-RGS (*Zond v. Intel*); 1:13-cv-11577-DPW (*Zond v. AMD, Inc., et al*); 1:13-cv-11581-DJC (*Zond v. Toshiba Am. Elec. Comp. Inc.*); 1:13-cv-11591-RGS (*Zond v. SK Hynix, Inc.*); 1:13-cv-11625-NMG (*Zond v. Renesas Elec. Corp.*) ; 1:13-cv-11634-WGY (*Zond v. Fujitsu, et al.*)¹; and 1:13-cv-11567-DJC (*Zond v. Gillette, Co.*) (Ex. 1235). Petitioner is also filing additional Petitions for *Inter Partes* review in several patents related² to the ’759 Patent.

¹ The Petitioner is a co-defendant with Fujitsu in this lawsuit.

² The related patents, e.g., name the same alleged inventor.

The claims of the present petition are presently the subject of a substantially similar petition for *inter partes* review styled *Intel Corporation v. Zond, Inc.*, which was filed March 6, 2014 and assigned Case No. IPR2014-00445. Petitioner will seek joinder with that *inter partes* review under 35 U.S.C. § 315(c), 37 C.F.R. §§ 42.22 and 42.122(b).

LEAD AND BACKUP COUNSEL

This section has not changed.

Lead Counsel: David L. McCombs (Registration No. 32,271)

Backup Counsel: David M. O'Dell (Registration No. 42,044)

Backup Counsel: Richard C. Kim (Registration No. 40,046)

SERVICE INFORMATION

This section has not changed.

E-mail: david.mcombs.ipr@haynesboone.com

david.odell.ipr@haynesboone.com

rckim@duanemorris.com

Post and hand delivery: David L. McCombs
Haynes and Boone, LLP
2323 Victory Avenue, Suite 700
Dallas, TX 75219

Telephone: 214-651-5533

Fax: 214-200-0853

Counsel agrees to service by email.

Dated: May 23, 2014

Respectfully submitted,

By: /David McCombs/
David L. McCombs
Registration No. 32,271
Counsel for Patent Owner

