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Filed on behalf of Taiwan Semiconductor Manufacturing Company, Ltd.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.
Petitioner

v.

ZOND, INC.
Patent Owner

Case IPR _____

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 7,147,759
CHALLENGING CLAIMS 22-33, 37, 46, 48 AND 50
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

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TABLE OF AUTHORITIES

In re ICON Health & Fitness, Inc., 496 F.3d 1374, 1379 (Fed. Cir. 2007).

37 C.F.R. §42.22(a)(1)

37 C.F.R. § 42.100(b)

37 C.F.R. §42.104(a)

37 C.F.R. §42.104(b)(1)-(5)

77 Fed. Reg. 48764 (Aug. 14, 2012).

I. MANDATORY NOTICES

A. Real Party-in-Interest

Taiwan Semiconductor Manufacturing Company, Ltd. (“Petitioner”) is the real party-in-interest.

B. Related Matters

Zond has asserted U.S. Patent No. 7,147,759 (“’759 Patent”) (Ex. 1301) 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. 1320). Petitioner is also filing additional Petitions for *Inter Partes* review in several patents related² to the ’759 Patent.

The below-listed claims of the ’759 Patent are presently the subject of a petition for *inter partes* review styled *Intel Corporation v. Zond, Inc.*, which was filed March 6, 2014 and assigned Case No. IPR2014-00446. 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).

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

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

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