

Paper No. \_\_\_\_\_

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD. and  
TSMC NORTH AMERICA CORPORATION,  
FUJITSU SEMICONDUCTOR LIMITED,  
FUJITSU SEMICONDUCTOR AMERICA, INC.,  
ADVANCED MICRO DEVICES, INC., RENESAS ELECTRONICS  
CORPORATION, RENESAS ELECTRONICS AMERICA, INC.,  
GLOBAL FOUNDRIES 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

---

Case IPR2014-00782<sup>1</sup>  
Patent 7,147,759 B2

---

**PETITIONERS' NOTICE OF PROPOSED MOTIONS**

---

<sup>1</sup> Cases IPR 2014-00850, IPR 2014-00986, and IPR 2014-01059 have been joined with the instant proceeding.

**NOTICE OF PROPOSED MOTIONS**

The present notice of proposed motions is filed as a consolidated filing. The initial conference call in this proceeding is scheduled for October 27, 2014 at 2:00 pm Eastern Time. Pursuant to the instructions for initial conference calls set forth in the Office Trial Practice Guide, Petitioners provide the following notice regarding anticipated motions in this proceeding.

Proposed Motions: As authorized in the Notice of Filing Date Accorded (Paper No. 4), Petitioner Taiwan Semiconductor Manufacturing Company, Ltd. and TSMC North America (collectively "TSMC") has or will file a motion asking that the Board recognize Mr. Anthony J. Fitzpatrick as counsel *pro hac vice* during this proceeding for TSMC.

Petitioners do not presently intend to file any other motions but nevertheless reserve the right to file a motion to exclude evidence or a motion for observation on the dates set forth in the scheduling order for this case, as well as to request permission to file any other motions that become necessary as the case develops (e.g., a motion for discovery).

Also, it is noted that Petitioners and Patent Owner are discussing possible changes to the dates set forth in the scheduling order and may file a notice stipulating to such changes, if agreement is reached.

Petitioners' Notice of Proposed Motions  
IPR2014-00782 (U.S. 7,147,759)

Respectfully submitted,

Date: October 24, 2014

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

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. §§ 42.6(e) and 42.105(a), this is to certify that I caused to be served a true and correct copy of the foregoing "PETITIONERS' NOTICE OF PROPOSED MOTIONS" as detailed below:

*Date of service* October 24, 2014

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

*Documents served* PETITIONERS' NOTICE OF PROPOSED MOTIONS

*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 McCombs/  
David McCombs  
Registration No. 32,271