

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.,  
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

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*Inter Partes* Review Case No. IPR2014-00782<sup>1</sup>

Patent 7,147,759 B2

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**PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION  
PURSUANT TO 37 C.F.R. § 42.10(c)**

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

This unopposed Motion for *Pro Hac Vice* admission is filed on behalf of Zond, LLC (“Zond” or “Patent Owner”). Zond respectfully moves that the Board recognize Mr. Etai Lahav as counsel *pro hac vice* during this proceeding.

Petitioners do not oppose this motion.

### **1. Time for Filing**

This Motion for *Pro Hac Vice* Admission is being filed no sooner than twenty-one (21) days after service of the petition. *See Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper No. 7.

### **2. Statement of Facts Showing Good Cause for Admission of Counsel**

#### ***Pro Hac Vice***

Patent Owner has been authorized to file motions seeking admission *pro hac vice* under 37 C.F.R. 42.10(c). (Paper No. 4). Patent Owner’s lead and back-up counsel are registered practitioners:

Lead Counsel: Dr. Gregory J. Gonsalves, USPTO Reg. No. 43,639; and

Backup Counsel: Bruce Barker, USPTO Reg. No. 33,291.

Mr. Lahav is a skilled litigator, has extensively participated in the co-pending litigation in federal district court involving the patent at issue in this proceeding, and if admitted, will be involved with the depositions that occur in this proceeding. U.S. Patent No. 7,147,759 is currently asserted by the Patent

Owner in co-pending litigation, in the District of Massachusetts, 1:13-cv-11634-WGY (*Zond v. Fujitsu, et al.*) (“the co-pending litigation”). Mr. Lahav is a member of the New York bar in good standing, and is representing the Patent Owner in the co-pending litigation.

Mr. Lahav has analyzed prior art references and claim charts in connection with invalidity contentions and has been involved in forming claim construction positions related to the claimed inventions, all of which are relevant to the petition requesting *inter partes* review of U.S. Patent No. 7,147,759. Patent Owner wishes to apply Mr. Lahav’s knowledge of the patent by employing him as counsel in this proceeding. Admission of Mr. Lahav *pro hac vice* will enable Patent Owner to avoid unnecessary expense and duplication of work between this proceeding and the co-pending litigation.

Patent Owner’s lead and backup counsel are registered practitioners and Mr. Lahav is an experienced litigation attorney having familiarity with the subject matter at issue in this proceeding. Therefore, Patent Owner respectfully submits that there is good cause for the Board to recognize Mr. Lahav as counsel *pro hac vice* during this proceeding.

Patent Owner is filing (or has filed) motions to admit three additional attorneys (Tigran Vardanian, Etai Lahav, and Maria Granovsky) *pro hac vice* to all the petitions associated with U.S. Patents 6853142, 7147759, 7604716,

7808184, 7811421, 6896775, 8125155, and 6896773. Given that there are 25 such petitions instituted over eight different patents, with numerous petitioners, Patent Owner needs additional attorneys admitted to be able to address the several depositions and related preparation that are expected to take place in the coming weeks.

### **3. Affidavit of Individual Seeking to Appear**

This Motion for *Pro Hac Vice* Admission is supported by an Affidavit of Mr. Lahav (Ex. 2001).

Date: November 26, 2014

Respectfully submitted,

/Dr. Gregory J. Gonsalves/  
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Counsel for Patent Owner Zond, LLC

**PATENT OWNER'S EXHIBIT LIST IPR2014-00782**

| <b>Exhibit No.</b> | <b>Description</b>  |
|--------------------|---|
| Ex. 2001           | Affidavit of Etai Lahav in Support of Patent Owner's Motion for <i>Pro Hac Vice</i> Admission       |
| Ex. 2002           | Affidavit of Maria Granovsky in Support of Patent Owner's Motion for <i>Pro Hac Vice</i> Admission  |
| Ex. 2003           | Affidavit of Tigran Vardanian in Support of Patent Owner's Motion for <i>Pro Hac Vice</i> Admission |

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