

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Inter Partes Review Case No. IPR2014-00782¹

Patent 7,147,759 B2

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

¹ 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 Dr. Maria Granovsky 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

Petitioner has been authorized to file motions seeking admission *pro hac vice* under 37 C.F.R. 42.10(c). (Paper No. 4). Petitioner’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.

Dr. Granovsky is a skilled litigator, has extensively participated in co-pending litigation in federal district court involving the subject matter of the patent at issue in this proceeding, and if admitted, will be involved with the depositions that occur in this proceeding. Dr. Granovsky is familiar with the

subject matter, claim construction, and prior art at issue in this proceeding as a result of her representation of Zond, LLC, in litigation in which the patents 6896775, 6896773, 6806651, 6903511, 7095179, and 7446479 have been asserted against several TSMC and Fujitsu entities. *Zond v. TSMC, et al.*, No. 1:14-cv-12438-WGY, D. Mass. Dr. Granovsky is a member of the New York and Delaware bars in good standing, and is representing the Patent Owner in the co-pending litigation.

Dr. Granovsky has analyzed the prior art references and invalidity arguments and is familiar with the claim construction positions of the petitioners and Zond, 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 Dr. Granovsky's knowledge of the subject matter of this proceeding and related district court litigation by employing her as counsel. Admission of Dr. Granovsky *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 Dr. Granovsky 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 Dr. Granovsky 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 Dr. Granovsky (Ex. 2002).

Date: November 26, 2014

Respectfully submitted,

/Gregory J. Gonsalves/

Dr. Gregory J. Gonsalves

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Counsel for Patent Owner Zond, LLC

PATENT OWNER'S EXHIBIT LIST IPR2014-00782

Exhibit No.	Description
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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