

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. IPR2014-00800¹

Patent 7,811,421 B2

AFFIDAVIT OF TIGRAN VARDANIAN IN SUPPORT OF PATENT

¹ Cases IPR 2014-00844, IPR 2014-00991, and IPR 2014-01037 have been joined with the instant proceeding.

OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION

I, Tigran Vardanian, being duly sworn and upon oath, hereby attest to the following:

- i. I am a member in good standing of the New York and Illinois Bars, as well as the following Federal Courts:
 - a) U.S. District Court for the Northern District of Illinois; and
 - b) U.S. District Court for the Eastern District of Michigan.
- ii. I have not been suspended or disbarred from practice before any court or administrative body.
- iii. I have never had an application for admission to practice before any court or administrative body denied.
- iv. No sanction or contempt citation has been imposed against me by any court or administrative body.
- v. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of the Code of Federal Regulations.
- vi. I will be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

- vii. Other than presently applying to appear *Pro Hac Vice* before the Office in connection with the *Inter Partes* Review proceedings of the patents listed below in section ix, I have not applied to appear *Pro Hac Vice* before the Office in any other proceeding in the last three years.
- viii. I am an experienced litigation attorney, with experience in many litigations involving patent infringement in District Courts across the country, including experience with fact and expert document and deposition discovery, claim construction, *Markman* hearings, motion practice, trials and hearings, and investigations before the International Trade Commission.
- ix. I am counsel for Patent Owner Zond, LLC, the plaintiff in related on-going litigations in which U.S. Patent Nos. 6805779, 6806652, 6853142, 7147759, 7604716, 7808184, 7811421, 6896775, 8125155, and 6896773 are and were asserted by the Patent Owner. I am familiar with the subject matter at issue in this proceeding as a result of my representation of Zond, LLC, in the related litigation, including the prior art that Petitioner presents in this proceeding, as well as issues of claim construction.

Patent No. 7,811,421
IPR2014-00800

Date: November 26, 2014

/Tigran Vardanian/
Tigran Vardanian
RADULESCU LLP
Empire State Building, Suite 6910
350 Fifth Avenue,
New York, NY 10118
tigran@Radulescullp.com