

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.,
TSMC NORTH AMERICA CORPORATION, ADVANCED MICRO DEVICES,
INC., RENESAS ELECTRONICS CORPORATION, RENESAS ELECTRONICS
AMERICA, INC., GLOBALFOUNDRIES 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 CO.

Petitioners

v.

ZOND, LLC
Patent Owner

Inter Partes Review Case No. IPR2014-00803

Patent 7,808,184 B2

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

This 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.

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. 3). Petitioner's lead and back-up counsel are registered practitioners:

Lead Counsel: Bruce Barker, USPTO Reg. No. 33,291; and

Backup Counsel: Dr. Gregory J. Gonsalves, USPTO Reg. No. 43,639.

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. 7,808,184. 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.

3. Affidavit of Individual Seeking to Appear

This Motion for *Pro Hac Vice* Admission is supported by an Affidavit of Dr. Granovsky (Ex. 2006).

Date: November 11, 2014

Respectfully submitted,

/Mr. Bruce Barker/
Mr. Bruce Barker
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Counsel for Patent Owner Zond, LLC

PATENT OWNER'S EXHIBIT LIST IPR 2014-00803

Exhibit No.	Description
Ex. 2001	Information Disclosure Statement
Ex. 2002	Webster's New World College Dictionary, 4 th Edition, 2008
Ex. 2003	U.S. Patent No. 6,896,773
Ex. 2004	U.S. Patent No. 6,806,652
Ex. 2005	Affidavit of Etai Lahav
Ex. 2006	Affidavit of Maria Granovsky

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