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Filed on behalf of: Taiwan Semiconductor Manufacturing Company, Ltd. and  
TSMC North America Corp.

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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. and  
TSMC NORTH AMERICA CORP.  
Petitioner

v.

ZOND, INC.  
Patent Owner

IPR Trial No. \_\_\_\_\_

**PETITION FOR *INTER PARTES* REVIEW OF  
U.S. PATENT NO. 7,811,421  
CHALLENGING CLAIMS 3-7, 18-20, 31, 32, 36, 40, 41, 44 and 45  
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

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**TABLE OF AUTHORITIES**

*In re ICON Health & Fitness, Inc.*, 496 F.3d 1374, 1379 (Fed. Cir. 2007).

37 C.F.R. §42.22(a)(1)

37 C.F.R. § 42.100(b)

37 C.F.R. §42.104(a)

37 C.F.R. §42.104(b)(1)-(5)

77 Fed. Reg. 48764 (Aug. 14, 2012).

## I. MANDATORY NOTICES

### A. Real Party-in-Interest

Taiwan Semiconductor Manufacturing Company, Ltd. and TSMC North America Corp. are the real parties-in-interest (“Petitioner”).

### B. Related Matters

Zond has asserted U.S. Patent No. 7,811,421 (“’421 Patent”) (Ex. 1101) against numerous parties in the District of Massachusetts, 1:13-cv-11570-RGS (*Zond v. Intel*); 1:13-cv-11577-DPW (*Zond v. AMD, Inc., et al*); 1:13-cv-11581-DJC (*Zond v. Toshiba Am. Elec. Comp. Inc.*); 1:13-cv-11591-RGS (*Zond v. SK Hynix, Inc.*); 1:13-cv-11625-NMG (*Zond v. Renesas Elec. Corp.*); 1:13-cv-11634-WGY (*Zond v. Fujitsu, et al.*)<sup>1</sup>; and 1:13-cv-11567-DJC (*Zond v. Gillette, Co.*). Petitioner is also filing additional Petitions for *Inter Partes* review in several patents related<sup>2</sup> to the ’421 Patent.

The below-listed claims of the ’421 Patent are presently the subject of a substantially identical petition for *inter partes* review styled *Intel Corporation v. Zond, Inc.*, which was filed March 7, 2014 and assigned Case No. IPR2014-00473. Petitioner plans to seek joinder with that *inter partes* review.

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<sup>1</sup> The Petitioner is a co-defendant with Fujitsu in this lawsuit.

<sup>2</sup> The related patents, e.g., name the same alleged inventor.

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