

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. IPR2014-00805¹

Patent 7,811,421 B2

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

¹ Cases IPR 2014-00851, IPR 2014-00990, and IPR 2014-01069 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. 3). Patent Owner’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.

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. 7,811,421 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. 7,811,421. 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,

/Bruce Barker/

Bruce Barker

Reg. No. 33,291

Chao Hadidi Stark & Barker LLP

176 East Main Street, Suite 6

Westborough, MA 01581

(508) 366-3800

bbarker@chsblaw.com

Counsel for Patent Owner Zond, LLC

PATENT OWNER'S EXHIBIT LIST IPR2014-00805

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

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.