

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

Case IPR2014-00807¹
Patent 7,604,716 B2

PATENT OWNER'S RESPONSE
35 USC § 316 AND 37 CFR § 42.120

¹ Cases IPR 2014-00846, IPR 2014-0974, and IPR 2014-01065 have been joined with the instant proceeding.

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TABLE OF AUTHORITIES

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STATUTES

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EXHIBIT LIST

Exhibit No.	Description
Ex. 2001	Affidavit of Etai Lahav in Support of Patent Owner's Motion for Pro Hac Vice Admission
Ex. 2002	Affidavit of Maria Granovsky in Support of Patent Owner's Motion for Pro Hac Vice Admission
Ex. 2003	Affidavit of Tigran Vardanian in Support of Patent Owner's Motion for Pro Hac Vice Admission
Ex. 2004	Declaration of Larry D. Hartsough, Ph.D.
Ex. 2005	Transcript of Deposition of Dr. Uwe Kortshagen, IPR2014-00807, -00808, -01099 & -01100, Dec. 22, 2014.
Ex. 2006	Eronini Umez-Eronini, SYSTEM DYNAMICS AND CONTROL, Brooks/Cole Publishing Co. (1999), pp. 10-13.
Ex. 2007	Robert C. Weyrick, FUNDAMENTALS OF AUTOMATIC CONTROL, McGraw-Hill Book Company (1975), pp. 10-13.
Ex. 2008	Chiang et al., U.S. Patent 6,398,929.

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