

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

FUJITSU SEMICONDUCTOR LIMITED,  
FUJITSU SEMICONDUCTOR AMERICA, INC.,  
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 COMPANY  
Petitioner

v.

ZOND, INC.  
Patent Owner

---

Case IPR2014-00807<sup>1</sup>  
U.S. PATENT NO. 7,604,716  
Title: METHODS AND APPARATUS FOR GENERATING HIGH-DENSITY  
PLASMA

---

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

---

<sup>1</sup> Cases IPR2014-01065, IPR2014-00974, and IPR2014-00846 have been joined with the instant proceeding.

**I. Relief Requested**

This Motion for *Pro Hac Vice* admission is filed solely on behalf of Petitioner GLOBALFOUNDRIES U.S., Inc., GLOBALFOUNDRIES Dresden Module One LLC & Co. KG, and GLOBALFOUNDRIES Dresden Module Two LLC & Co. KG (collectively, “GlobalFoundries” or “Petitioner”). GlobalFoundries respectfully requests that the Board recognize Mr. Brett C. Rismiller as counsel *pro hac vice* during this proceeding.

**II. 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. IPR2013-00639, Paper No. 7.

**III. Statement of Facts Showing Good Cause for the Board to Recognize Counsel *Pro Hac Vice* During the Proceedings**

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.

In accordance with 37 C.F.R. § 42.10(c), the Board may recognize counsel *pro hac vice* during a proceeding upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and to any other conditions that the Board may impose. The facts here establish good cause for the Board to recognize Brett C. Rismiller *pro hac vice* on behalf of Petitioner during this

proceeding.

In summary, Mr. Rismiller is an experienced litigator, has established familiarity with the subject matter at issue in this proceeding from his participation in co-pending litigation involving the subject patent, and, if admitted, will be involved in the depositions that occur in this proceeding. Specifically, U.S. Patent No. 7,604,716 is currently asserted against Petitioner in co-pending litigation, in the District of Massachusetts, 1:13-cv-11577-LTS (*Zond v. AMD, et al.*) (“the co-pending litigation”). Mr. Rismiller is a member of the California bar in good standing and works closely with the team representing the Petitioner in the co-pending litigation.

Mr. Rismiller 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. 7,604,716. Petitioner wishes to apply Mr. Rismiller's knowledge of the patent by employing him as counsel in this proceeding. Admission of Mr. Rismiller *pro hac vice* will enable Petitioner to avoid unnecessary expense and duplication of work between this proceeding and the co-pending litigation.

Petitioner's lead and backup counsel are registered practitioners and Mr. Rismiller is an experienced litigation attorney having familiarity with the subject

matter at issue in this proceeding. Therefore, Petitioners respectfully submit that there is good cause for the Board to recognize Mr. Rismiller as counsel *pro hac vice* during this proceeding.

**IV. Affidavit of Individual Seeking to Appear**

This Motion for *Pro Hac Vice* Admission is supported by an Affidavit of Mr. Rismiller (Ex. 1220).

Respectfully submitted,

Date: April 3, 2015

/s/ David M. Tennant  
David M. Tennant  
Lead Counsel for Petitioner  
GlobalFoundries  
Registration No. 48,362

**Petitioner's Updated Exhibit List**  
**December 15, 2014**

<b>Exhibit</b>	<b>Description</b>
1201	U.S. Patent No. 7,604,716 ("716 Patent")
1202	Kortshagen Declaration ("Kortshagen Decl.")
1203	D.V. Mozgrin, <i>et al</i> , <u>High-Current Low-Pressure Quasi-Stationary Discharge in a Magnetic Field: Experimental Research</u> , Plasma Physics Reports, Vol. 21, No. 5, pp. 400-409, 1995 ("Mozgrin")
1204	U.S. Pat. No. 6,413,382 ("Wang")
1205	A. A. Kudryavtsev and V.N. Skerbov, <u>Ionization relaxation in a plasma produced by a pulsed inert-gas discharge</u> , Sov. Phys. Tech. Phys. 28(1), pp. 30-35, January 1983 ("Kudryavtsev")
1206	U.S. Pat. No. 6,853,142 ("142 Patent")
1207	File History for U.S. Pat. No. 7,604,716, Office Action dated March 27, 2008 ("03/27/08 Office Action")
1208	File History for U.S. Pat. No. 7,604,716, Response dated September 24, 2008 ("09/24/08 Response")
1209	File History for U.S. Pat. No. 7,604,716, Notice of Allowance dated June 11, 2009 ("06/11/09 Allowance")
1210	European Patent Application 1560943, Response of April 21, 2008 ("04/21/08 Response in EP 1560943")
1211	U.S. Patent No. 7,147,759 ("759 Patent")
1212	File History for U.S. Pat. No. 7,147,759, Response dated May 2, 2006 ("05/02/06 Response of '759 Patent File History")
1213	Plasma Etching: An Introduction, by Manos and Flamm, Academic Press (1989) ("Manos")

# 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.