

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.,  
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 No. IPR2014-00807<sup>1</sup>

Patent 7,604,716 B2

---

**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**  
**37 C.F.R. § 42.70**

---

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

Pursuant to 37 C.F.R. § 42.70(a), Patent Owner, Zond, LLC, respectfully requests oral argument at a place and time set by the Board. Oral argument is presently scheduled for June 12, 2015 (Paper No. 10, Scheduling Order).

The present proceeding involves U.S. Patent 7,604,716, which is also at issue in IPR2014-00808, IPR2014-01099, and IPR2014-01100. Concurrently with this request for oral argument, similar requests are being filed in each of these related proceedings. Patent Owner requests that, for the convenience of the parties and the Board, a single oral hearing be conducted on all the issues in these proceedings, as set forth below. To allow for a complete review of these issues, Patent Owner requests one hour of argument time.

#### **ISSUES TO BE ADDRESSED DURING ORAL ARGUMENT**

- A. Claims 1-11, and 33 are patentable under 35 U.S.C. § 102 over Wang (IPR2014-01099);
- B. Claims 12 and 13 are patentable under 35 U.S.C. § 103(a) over Wang and Lantsman (IPR2014-01100);
- C. Claims 14-18 and 25-32 are patentable under 35 U.S.C. § 103(a) over Wang and Kudryavtsev (IPR2014-00807);
- D. Claim 21 is patentable under 35 U.S.C. § 103(a) over Wang and Kudryavtsev (IPR2014-00808);

- E. Claims 19 and 20 are patentable under 35 U.S.C. § 103(a) over Wang, Kudryavtsev, and Lantsman (IPR2014-00808); and
- F. Claims 22-24 are patentable under 35 U.S.C. § 103(a) over Wang, Kudryavtsev, and Mozgrin (IPR2014-00808).

Date: May 15, 2015

Respectfully submitted,

/Tarek N. Fahmi/

Tarek N. Fahmi, Reg. No. 41,402  
Ascenda Law Group, PC  
333 W. San Carlos St., Suite 200  
San Jose, CA 95110  
1 866 877 4883  
tarek.fahmi@ascendalaw.com

Counsel for Patent Owner Zond, LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing

**PATENT OWNER'S REQUEST FOR ORAL HEARING**

was served on May 15, 2015, by filing this document through the Patent Review Processing System as well as delivering a copy via electronic mail directed to the attorneys of record for the Petitioner at the following address:

For Petitioner:

THE GILLETTE COMPANY

David L. Cavanaugh, Reg. No. 36,476

Larissa Park, Reg. No. 59,051

Wilmer Cutler Pickering Hale and

Dorr LLP

60 State Street

Boston, MA 02109

Tel: (617) 526-5000

Email:

[David.Cavanaugh@wilmerhale.com](mailto:David.Cavanaugh@wilmerhale.com);

[Larissa.Park@wilmerhale.com](mailto:Larissa.Park@wilmerhale.com)

For Petitioner:

FUJITSU SEMICONDUCTOR

LIMITED AND FUJITSU

SEMICONDUCTOR AMERICA,

INC.

David L. McCombs, Reg. No. 32,271

David M. O'Dell, Reg. No. 42,044

Haynes and Boone, LLP

2323 Victory Avenue, Suite 700

Dallas, TX 75219

Tel: (214) 651-5533

Email:

[David.McCombs@haynesboone.com](mailto:David.McCombs@haynesboone.com);

[david.odell@haynesboone.com](mailto:david.odell@haynesboone.com)

For Petitioner:

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., AND TOSHIBA CORPORATION

Robinson Vu  
BAKER BOTTS LLP  
ONE SHELL PLAZA  
910 LOUISIANA STREET  
HOUSTON, TX 77002  
[Robinson.vu@bakerbotts.com](mailto:Robinson.vu@bakerbotts.com)

Brian M. Berliner  
Ryan K. Yagura  
Xin-Yi Zhou  
O'MELVENY & MYERS LLP  
400 S. HOPE STREET  
LOS ANGELES, CA 90071  
[bberliner@omm.com](mailto:bberliner@omm.com);  
[ryagura@omm.com](mailto:ryagura@omm.com);  
[vzhou@omm.com](mailto:vzhou@omm.com)

John Feldhaus  
Pavan Agarwal  
Mike Houston  
FOLEY & LARDNER LLP  
3000 K STREET, N.W., SUITE 600  
WASHINGTON, DC 20007  
[jfeldhaus@foley.com](mailto:jfeldhaus@foley.com);  
[pagarwal@foley.com](mailto:pagarwal@foley.com);  
[mhouston@foley.com](mailto:mhouston@foley.com)

David M. Tennant  
WHITE & CASE LLP  
701 THIRTEENTH STREET, NW  
WASHINGTON, DC 20005  
[dtennant@whitecase.com](mailto:dtennant@whitecase.com)

The parties have agreed to electronic service in this matter.

Respectfully submitted,

Date: May 15, 2015

by: /Tarek N. Fahmi/

Tarek N. Fahmi, Reg. No. 41,402

Ascenda Law Group, PC  
333 W. San Carlos St., Suite 200  
San Jose, CA 95110  
1 866 877 4883