

DOCKET NO.: 34789.117

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TSMC North America Corp.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD. and
TSMC NORTH AMERICA CORP.
Petitioner

v.

ZOND, INC.
Patent Owner

Case No. IPR_____

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 7,604,716
CHALLENGING CLAIMS 14-18 AND 25-32
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. 7,604,716 (“’716 Patent”) (Ex. 1201) 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.*)¹; and 1:13-cv-11567-DJC (*Zond v. Gillette, Co.*). Petitioner is also filing additional Petitions for *Inter Partes* review in several patents related² to the ’716 Patent.

The below-listed claims of the ’716 Patent are presently the subject of a substantially identical petition for *inter partes* review styled *Intel Corporation v. Zond, Inc.*, which was filed March 27, 2014 and assigned Case No. IPR2014-00522. Petitioner will seek joinder with that *inter partes* review under 35 U.S.C. § 315(c), 37 C.F.R. §§ 42.22 and 42.122(b).

¹ The Petitioner is a co-defendant with Fujitsu in this lawsuit.

² The related patents, e.g., name the same alleged inventor.

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