

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.,
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,
Petitioners,

v.

ZOND, LLC
Patent Owner

Case IPR2014-00818¹
Patent 6,853,142 B2

JOINT REQUEST TO MAINTAIN CONFIDENTIALITY
AND TO KEEP SEPARATE
PURSUANT TO 35 U.S.C. § 327(b) AND 37 C.F.R. § 42.74

¹ Cases IPR 2014-00866, IPR 2014-01012, and IPR 2014-01075 have been joined with the instant proceeding.

I. INTRODUCTION

ZOND LLC (“Patent Owner”) and Petitioners TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD. and TSMC NORTH AMERICA CORP (jointly, “TSMC”) (collectively, “the Parties” or “Petitioner”) have executed a Settlement Agreement regarding U.S. Patent No. 6,853,142. Pursuant to 35 U.S.C. § 327(b), the Parties jointly request that the Board treat the Settlement Agreement as business confidential information and keep it separate from the file of the involved patent.

II. STATEMENT OF PRECISE RELIEF REQUESTED

The Parties jointly request that the Board treat the Settlement Agreement (Exhibit 1020) as business confidential information and keep it separate from the file of the involved patent. The Parties further request the Board to not make the Settlement Agreement available to any third-party, except as provided for in 35 U.S.C. § 327(b) and 37 C.F.R. § 42.74.

III. STATEMENT OF REASONS FOR THE RELIEF REQUESTED

The Parties have settled all of their disputes involving U.S. Patents Nos. 6,805,779 (the “779 patent”), 6,806,652 (the “652 patent”), 6,853,142 (the “142 patent”), 6,896,773 (the “773 patent”), 6,896,775 (the “775 patent”), 7,147,759 (the “759 patent”), 7,604,716 (the “716 patent”), 7,808,184 (the “184 patent”),

IPR2014-00818
U.S. Patent No. 6,853,142

JOINT REQUEST TO MAINTAIN CONFIDENTIALITY
AND TO KEEP SEPARATE

and 7,811,421 B2 (the “421 patent”) (collectively, the “Patents”). The Settlement Agreement provides that its terms are confidential and the Parties have treated them as such. The Parties have filed, concurrently herewith, a true and correct copy of the Settlement Agreement (Exhibit 1020), as required by 35 U.S.C. § 327(b) and 37 C.F.R. § 42.74. The Exhibit was filed via the PRPS system to provide availability to “Board Only.” The Parties jointly request that the Settlement Agreement be treated as business confidential information and be kept separate from the file of the involved patent, pursuant to 35 U.S.C. § 327(b) and 37 C.F.R. § 42.74(c).

Respectfully submitted,

For Patent Owner:
ZOND, LLC

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

/Dr. Gregory Gonsalves/
Dr. Gregory Gonsalves
2216 Beacon Lane
Falls Church, Virginia 22043
gonsalves@gonsalveslawfirm.com

/David M. O’Dell/
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
david.mccombs.ipr@haynesboone.com;
david.odell.ipr@haynesboone.com

Dated: March 11, 2015

IPR2014-00818
U.S. Patent No. 6,853,142
JOINT REQUEST TO MAINTAIN CONFIDENTIALITY
AND TO KEEP SEPARATE

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), this is to certify that I caused to be served a true and correct copy of the foregoing “JOINT REQUEST TO MAINTAIN CONFIDENTIALITY AND TO KEEP SEPARATE PURSUANT TO 35 U.S.C. § 327(b) AND 37 C.F.R. § 42.74” as detailed below:

Date of service March 11, 2015

Manner of service Email: gonsalves@gonsalveslawfirm.com;
bbarker@chsblaw.com;

Documents served JOINT REQUEST TO MAINTAIN CONFIDENTIALITY
AND TO KEEP SEPARATE PURSUANT TO 35 U.S.C. §
327(b) AND 37 C.F.R. § 42.74

Persons Served Bruce Barker
Chao Hadidi Stark & Barker LLP
176 East Mail Street, Suite 6
Westborough, MA 01581

Dr. Gregory J. Gonsalves
2216 Beacon Lane
Falls Church, Virginia 22043

/David M. O’Dell/
David M. O’Dell
Lead Counsel for Petitioner TSMC
Registration No. 42,044