

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 IPR2014-00828¹
Patent 6,805,779 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 2014-00856, IPR2014-01022, and IPR2014-01070 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. 6,805,779. 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 1219) 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

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patent”), 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 1219), 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.

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Dated: March 11, 2015

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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

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