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Filed on behalf of: Taiwan Semiconductor Manufacturing Company, Ltd. and
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 IPR _____

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 6,805,779
CHALLENGING CLAIMS 30-40
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

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U.S. Patent 6,805,779 Claims 30-40
Petition for *Inter Partes* Review

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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. 6,805,779 (“‘779 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 has also filed IPR 2014-00598 and IPR 2014-00686 for other claims of the ‘779 Patent.

The below-listed claims of the ‘142 Patent are presently the subject of a substantially identical petition for *inter partes* review styled *Intel Corporation v. Zond, Inc.*, which was filed May 16, 2014 and assigned Case No. IPR2014-00765. 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.

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II. CERTIFICATION OF GROUNDS FOR STANDING

Petitioner certifies pursuant to Rule 42.104(a) that the patent for which review is sought is available for *inter partes* review and that Petitioner is not barred or estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in this Petition.

III. OVERVIEW OF CHALLENGE AND RELIEF REQUESTED

Pursuant to Rules 42.22(a)(1) and 42.104(b)(1)-(2), Petitioner challenges claims 30-40 of the '779 Patent.

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