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Filed on behalf of: Taiwan Semiconductor Manufacturing Company, Ltd. and
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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 16, 28, 41, 42, 45 AND 46
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

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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. 1301) 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 filed Petition Nos. IPR2014-00598, IPR2014-00686, and IPR2014-00765 for other claims of the 779 Patent; and is also filing additional Petitions for *Inter Partes* review in this and several patents with the same named inventor as 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 27, 2014 and assigned Case No. IPR2014-00820. 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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