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Filed on behalf of: Fujitsu Semiconductor Limited and Fujitsu Semiconductor  
America, Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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FUJITSU SEMICONDUCTOR LIMITED AND  
FUJITSU SEMICONDUCTOR AMERICA, INC..  
Petitioner

v.

ZOND, INC.  
Patent Owner

Case IPR \_\_\_\_\_

**PETITION FOR *INTER PARTES* REVIEW OF  
U.S. PATENT NO. 7,147,759  
CHALLENGING CLAIMS 22-33, 37, 46, 48 AND 50  
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

Fujitsu Semiconductor Limited and Fujitsu Semiconductor America, Inc. are the real parties-in-interest (“Petitioner”).

### B. Related Matters

Zond has asserted U.S. Patent No. 7,147,759 (“’759 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.*); and 1:13-cv-11567-DJC (*Zond v. Gillette, Co.*) (Ex. 1320). Petitioner is also filing additional Petitions for *Inter Partes* review in several patents related<sup>1</sup> to the ’759 Patent.

The below-listed claims of the ’759 Patent are presently the subject of a petition for *inter partes* review styled *Intel Corporation v. Zond, Inc.*, which was filed March 6, 2014 and assigned Case No. IPR2014-00446. 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).

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<sup>1</sup> The related patents, e.g., name the same alleged inventor.

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