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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. 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**

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. 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.*); 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).

**C. Counsel**

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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.

**A. Prior Art Patents and Printed Publications**

The following references, and others listed in the Table of Exhibits, are pertinent to the grounds of unpatentability explained below, and are each prior art under 102(b):

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