DOCKET NO.: 52055.2
Filed on behalf of: Fujitsu Semiconductor Limited and Fujitsu Semiconductor America, Inc.
By: David M. O'Dell, Reg. No. 42,044
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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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 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

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. 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.*). 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).

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