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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. 6,806,652
CHALLENGING CLAIMS 18-34
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. 6,806,652 (“the ’652 Patent”) (Ex. 1101) 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 is also filing additional Petitions for *Inter Partes* review in several patents by the same named inventor as the ’652 Patent.

The below-listed claims of the ’652 Patent are presently the subject of a substantially identical petition for *inter partes* review styled *Intel Corporation v. Zond, Inc.*, which was filed May 30, 2014 and assigned Case No. IPR2014-00843. Petitioner plans to seek joinder with that *inter partes* review.

¹ The Petitioner is a co-defendant with Fujitsu in this lawsuit.

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