

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FUJITSU SEMICONDUCTOR LIMITED,
FUJITSU SEMICONDUCTOR AMERICA, INC.,
THE GILLETTE COMPANY, RENESAS ELECTRONICS
CORPORATION, RENESAS ELECTRONICS AMERICA, INC.,
ADVANCED MICRO DEVICES, INC., GLOBALFOUNDRIES U.S., INC.,
GLOBALFOUNDRIES DRESDEN MODULE ONE LLC & CO. KG,
GLOBALFOUNDRIES DRESDEN MODULE TWO LLC & CO. KG,
TOSHIBA AMERICA ELECTRONIC COMPONENTS, INC.,
TOSHIBA AMERICA INC., TOSHIBA AMERICA
INFORMATION SYSTEMS, INC., and
TOSHIBA CORPORATION,

Petitioners

v.

ZOND, LLC
Patent Owner

Case No. IPR2014-00861¹
Patent 6,806,652 B2

**JOINT MOTION TO TERMINATE PURSUANT TO
35 U.S.C. § 317 AND 37 C.F.R. § 42.72**

¹ Cases IPR2014-00864, IPR2014-01003, and IPR2014-01066 have been joined with the instant proceeding.

Pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.72, and the Patent Trial and Appeal Board's ("Board's") authorization of December 29, 2015, Patent Owner ZOND, LLC ("Patent Owner") and Petitioners FUJITSU SEMICONDUCTOR LIMITED and FUJITSU SEMICONDUCTOR AMERICA, INC. (jointly, "Fujitsu" or "Petitioner") (collectively with Patent Owner, "the Parties") have filed stipulations of dismissal without prejudice in their related district court litigation pursuant to a settlement between Patent Owner and Fujitsu's supplier and jointly request termination of *Inter Partes* Review No. IPR2014-00864, regarding U.S. Patent No. 6,806,652, as to Petitioners FUJITSU SEMICONDUCTOR LIMITED and FUJITSU SEMICONDUCTOR AMERICA, INC., only. Because at least one petitioner remains, the grant of this motion will not result in the termination of this *inter partes* review.

I. PROCEEDING

The following *inter partes* review proceeding ("IPR") is currently before the Board:

U.S. Patent Number	IPR Case Number
6,806,652	IPR2014-00864 / IPR2014-00861

The Parties jointly request termination of this proceeding as to Fujitsu. The Parties have filed stipulations of dismissal in their related district court actions

between Patent Owner and Fujitsu (identified below) concerning the asserted Zond patents in the chart below. The stipulations of dismissal are attached as Exhibit 2006.

The various patents that are involved in litigation are as follows:

Caption	Case No.	Patents	Defendants	Status
Zond, LLC v. Fujitsu Semiconductor Limited et al.	1:13-cv-11634 (MAD)	6,805,779 6,806,652 6,853,142 7,147,759 7,604,716 7,808,184 7,811,421	Fujitsu Semiconductor Limited; Fujitsu Semiconductor America, Inc.; Taiwan Semiconductor Manufacturing Company Limited (“TSMC”); TSMC North America Corp. (“TSMCNA”)	Admin. closed; terminated as to TSMC and TSMCNA; stipulation of dismissal filed as to Fujitsu
Zond, LLC v. Renesas Electronics Corporation et al.	1:13-cv-11625 (MAD)	6,805,779 6,806,652 6,853,142 7,147,759 7,604,716 7,808,184 7,811,421	Renesas Electronics America, Inc.; Renesas Electronics Corporation	Pending; stayed

Caption	Case No.	Patents	Defendants	Status
Zond, LLC v. SK Hynix Inc. et al.	1:13-cv-11591 (MAD)	6,805,779 6,806,652 6,853,142 7,147,759 7,604,716 7,808,184 7,811,421	Hynix Semiconductor America, Inc.; SK Hynix America Inc.; SK Hynix Inc.; SK Hynix Memory Solutions Inc.	Terminated
Zond, LLC v. Toshiba America Electronic Components, Inc. et al.	1:13-cv-11581 (MAD)	6,805,779 6,806,652 6,853,142 7,147,759 7,604,716 7,808,184 7,811,421	Toshiba America Electronic Components, Inc.; Toshiba America Information Systems, Inc.; Toshiba Corporation	Pending; stayed
Zond, LLC v. Advanced Micro Devices, Inc., et al.	1:13-cv-11577 (MAD)	6,805,779 6,806,652 6,853,142 7,147,759 7,604,716 7,808,184 7,811,421	Advanced Micro Devices, Inc.; GlobalFoundries Dresden Module One LLC & Co. KG; GlobalFoundries Dresden Module Two LLC & Co. KG; Global Foundries US, Inc.	Pending; stayed
Zond, Inc. v. The Gillette Company, et al.	1:13-cv-11567 (MAD)	6,805,779 6,806,652 6,853,142 6,896,773 6,896,775 7,147,759 7,604,716 7,808,184 7,811,421 8,125,155	The Gillette Company; The Proctor & Gamble Company	Pending; stayed

Caption	Case No.	Patents	Defendants	Status
Zond, LLC v. Intel Corporation	1:13-cv-11570 (MAD)	6,805,779 6,806,652 6,853,142 7,147,759 7,604,716 7,808,184 7,811,421	Intel Corporation	Terminated
Zond, LLC v. Fujitsu Semiconductor Limited et al.	1:14-cv-12438 (MAD)	6,806,651 6,896,773 6,896,775 6,903,511 7,095,179 7,446,479	Fujitsu Semiconductor Limited; Fujitsu Semiconductor America, Inc.; Taiwan Semiconductor Manufacturing Company Limited; TSMC North America Corp.	Admin. closed; terminated as to TSMC and TSMCNA; stipulation of dismissal filed as to Fujitsu
TSMC Technology, Inc., et al. v. Zond, Inc.	1:14-cv-00721 (DED)	6,806,651 6,896,773 6,896,775 6,903,511 7,095,179 7,446,479	Zond, Inc.	Terminated

II. BRIEF EXPLANATION AS TO WHY TERMINATION IS APPROPRIATE

Inasmuch as no final written decision has yet been entered, and because Patent Owner and Fujitsu are jointly making this motion, termination of this IPR as to Fujitsu is appropriate, as the Board has not yet “decided the merits of the proceeding.” 35 U.S.C. § 317(a). Further, because Patent Owner and Fujitsu

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.