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

By: David M. O'Dell, Reg. No. 42,044
David L. McCombs, Reg. No. 32,271

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. 6,853,142
CHALLENGING CLAIMS 1, 3-10, 12, 15, 17-20 AND 42
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. 6,853,142 (“’142 Patent”) (Ex. 1001) 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 is also filing additional Petitions for *Inter Partes* review in several patents related¹ to the ’142 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 March 13, 2014 and assigned Case No. IPR2014-00494. 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).

¹ The related patents, e.g., name the same alleged inventor.

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