UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.,
TSMC NORTH AMERICA CORPORATION,
FUJITSU SEMICONDUCTOR LIMITED,
FUJITSU SEMICONDUCTOR AMERICA, INC.,
ADVANCED MICRO DEVICES, INC., RENESAS ELECTRONICS
CORPORATION, RENESAS ELECTRONICS AMERICA, INC.,
GLOBAL FOUNDRIES 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.,
TOSHIBA CORPORATION, and
THE GILLETTE COMPANY,
Petitioners,

v.

ZOND, LLC
Patent Owner

_____

Inter Partes Review Case No. IPR2014-00917[1]

Patent 6,805,779 B2

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PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION

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[1] Case IPR2014-00918, IPR2014-01074, and IPR2014-01025 have been joined with the instant proceeding.

PURSUANT TO 37 C.F.R. § 42.10(c)

This unopposed Motion for *Pro Hac Vice* admission is filed on behalf of

Zond, LLC ("Zond" or "Patent Owner"). Zond respectfully moves that the Board

recognize Mr. Michael D. Sadowitz as counsel *pro hac vice* during this proceeding.

Petitioners do not oppose this motion.

1. Time for Filing

This Motion for *Pro Hac Vice* Admission is being filed no sooner than

twenty-one (21) days after service of the petition. *See Unified Patents, Inc. v.*

Parallel Iron, LLC, IPR2013-00639, Paper No. 7.

2. Statement of Facts Showing Good Cause for Admission of Counsel

Pro Hac Vice

Patent Owner has been authorized to file motions seeking admission *pro hac*

vice under 37 C.F.R. 42.10(c). (Paper No. 4). Patent Owner's lead and back-up

counsel are registered practitioners:

Lead Counsel: Dr. Gregory J. Gonsalves, USPTO Reg. No. 43,639; and

Backup Counsel: Bruce Barker, USPTO Reg. No. 33,291.

Mr. Sadowitz is a skilled litigator, has extensively participated in the co-

pending litigation in federal district court involving the patent at issue in this

proceeding, and if admitted, will be involved with the depositions that occur in this

proceeding. U.S. Patent No. 6,805,779 is currently asserted by the Patent Owner in co-pending litigation, in the District of Massachusetts, 1:13-cv-11634-WGY (*Zond v. Fujitsu, et al.*) ("the co-pending litigation"). Mr. Sadowitz is a member of the New York bar in good standing, and is representing the Patent Owner in the co-pending litigation.

Mr. Sadowitz has analyzed prior art references and claim charts in connection with invalidity contentions and has been involved in forming claim construction positions related to the claimed inventions, all of which are relevant to the petition requesting *inter partes* review of U.S. Patent No. 6,805,779. Patent Owner wishes to apply Mr. Sadowitz's knowledge of the patent by employing him as counsel in this proceeding. Admission of Mr. Sadowitz *pro hac vice* will enable Patent Owner to avoid unnecessary expense and duplication of work between this proceeding and the co-pending litigation.

Patent Owner's lead and backup counsel are registered practitioners and Mr. Sadowitz is an experienced litigation attorney having familiarity with the subject matter at issue in this proceeding. Therefore, Patent Owner respectfully submits that there is good cause for the Board to recognize Mr. Sadowitz as counsel *pro hac vice* during this proceeding.

Patent Owner is filing (or has filed) motions to admit three additional attorneys (Tigran Vardanian, Etai Lahav, and Maria Granovsky) *pro hac vice* to all

the petitions associated with U.S. Patents 6853142, 7147759, 7604716, 7808184, 7811421, 6896775, 8125155, and 6896773. Given that there are 25 such petitions instituted over eight different patents, with numerous petitioners, Patent Owner needs additional attorneys admitted to be able to address the several depositions and related preparation that are expected to take place in the coming weeks.

3. Affidavit of Individual Seeking to Appear

This Motion for *Pro Hac Vice* Admission is supported by an Affidavit of Mr. Sadowitz (Ex. 2001).

Date: January 8, 2015   Respectfully submitted,

/Dr. Gregory J. Gonsalves/
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Counsel for Patent Owner Zond, LLC

PATENT OWNER'S EXHIBIT LIST IPR2014-00917

Exhibit No.	Description
Ex. 2001	Affidavit of Michael D. Sadowitz in Support of Patent Owner's Motion for *Pro Hac Vice* Admission

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