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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

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD. and  
TSMC NORTH AMERICA CORP.  
Petitioner

v.

ZOND INC.  
Patent Owner

Case No. \_\_\_\_\_

**PETITION FOR *INTER PARTES* REVIEW OF  
U.S. PATENT NO. 6,805,779  
CHALLENGING CLAIMS 7, 9, 20, 21, 38, AND 44  
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. 6,805,779 (“‘779 Patent”) (Ex. 1401) 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.*);<sup>1</sup> and 1:13-cv-11567-DJC (*Zond v. Gillette, Co.*). Petitioner has also filed IPR 2014-00598 and IPR 2014-00686 for other claims of 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 16, 2014 and assigned Case No. IPR2014-00765. 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).

### **C. Counsel**

Lead Counsel: David M. O’Dell (Registration No. 42,044)

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<sup>1</sup> The Petitioner is a co-defendant with Fujitsu in this lawsuit.

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