

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ADVANCED MICRO DEVICES, INC., RENESAS ELECTRONICS
CORPORATION, RENESAS ELECTRONICS AMERICA, 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, INC.
Patent Owner

Case No. _____

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 7,811,421
CHALLENGING CLAIMS 1, 2, 8, 10-13, 15-17, 22-25, 27-30, 33, 34, 38, 39,
42, 43 AND 46-48
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

TABLE OF CONTENTS

I. Mandatory Notices - 1 -
 A. Real Party-in-Interest - 1 -
 B. Related Matters..... - 1 -
 C. Counsel - 2 -
 D. Service Information - 2 -
II. Certification of Grounds for Standing - 2 -
III. Overview of Challenge and Relief Requested - 3 -
 A. Prior Art Patents and Printed Publications - 3 -
 B. Grounds for Challenge - 4 -
IV. Brief Description of Technology - 4 -
 A. Plasma..... - 4 -
 B. Ions and Excited Atoms - 6 -
V. Overview of the '421 Patent - 7 -
 A. Summary of Alleged Invention of the '421 Patent - 7 -
 B. Prosecution History - 7 -
VI. Overview of the primary prior art references - 8 -
 A. Summary of the prior art - 8 -
 B. Overview of Mozgrin - 8 -
 C. Overview of Wang - 10 -
VII. Claim Construction..... - 12 -
 A. “weakly-ionized plasma” and “strongly-ionized plasma” - 12 -
VIII. Specific Grounds for Petition - 14 -
 A. Ground I: Claims 1, 2, 8, 10-13, 15, 16, 34, 38, 39, 43 and 46-48 are
 anticipated by Mozgrin - 14 -
 1. Independent claim 1 is anticipated by Mozgrin - 15 -
 2. Independent claim 34 is anticipated by Mozgrin - 23 -
 3. Independent claims 46-48 are anticipated by Mozgrin - 25 -
 4. Dependent claims 2, 8, 10, 11, 12, 13, 15, 16, 38, 39 and 43 are
 anticipated by Mozgrin - 27 -

B. Ground II: Claims 1, 2, 8, 10-13, 16, 17, 22-25, 28-30, 33, 34, 39, 42, 43 and 46-48 are anticipated by Wang - 33 -

- 1. Independent claim 1 is anticipated by Wang - 33 -
- 2. Independent claim 17 is anticipated by Wang - 39 -
- 3. Independent claim 34 is anticipated by Wang - 41 -
- 4. Independent claims 46-48 are anticipated by Wang - 42 -
- 5. Dependent claims 2, 8, 10-13, 16, 22-25, 28, 29, 30, 33, 39, 42 and 43 are anticipated by Wang..... - 44 -

C. Ground III: Claims 17, 22-25, 27-30, 33, and 42 are obvious over the combination of Mozgrin and Lantsman..... - 50 -

- 1. Independent claim 17 - 50 -
- 2. Dependent claims 22-25, 27-30, 33 and 42 are obvious over the combination of Mozgrin with Lantsman - 54 -

D. Ground IV: Claims 15, 27 and 38 are obvious over the combination of Wang and Mozgrin..... - 56 -

IX. Conclusion - 59 -

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

Advanced Micro Devices, Inc., Renesas Electronics Corporation, Renesas Electronics America, 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 (collectively, “Petitioner”) are the real parties-in-interest.

B. Related Matters

Zond has asserted U.S. Patent No. 7,811,421 (“’421 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.*) (Ex. 1022). Petitioner is also filing additional Petitions for *Inter Partes* review in several patents related¹ to the ’421 Patent. The below-listed claims of the ’421 Patent are presently the subject of three substantially identical petitions for *inter*

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

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