Docket No. 1642930-0006 IPR1

UNITED STA	TES PATENT A	IND TRAD	EMAKK OF	FICE
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BEFORE TH	E PATENT TRI	IAL AND A	APPEAL BO	ARD

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. 7,808,184 CHALLENGING CLAIMS 1-5 AND 11-15 UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104



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3. Dependent claims 2, 4, 5 and 12, 14 and 15 are obvious in view of the combination of Mozgrin and Kudryavtsev
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B. Ground II: Claims 1, 2, 4, 5 and 11, 12, 14 and 15 are obvious in view of the combination of Mozgrin and the Mozgrin Thesis
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1. Independent claim 1
2. Independent claim 11
3. Dependent claims 2, 4, 5, 12, 14 and 15
C. Ground III: Claim 3 and 13 are obvious in view of the combination of Mozgrin, Kudryavtsev and Wang
D. Ground IV: Claim 3 and 13 are obvious in view of the combination of Mozgrin, Mozgrin Thesis and Wang
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of wang and Rudiyavisev43
1. Independent claim 1
2. Independent claim 11
3. Dependent claims 2-5 and 12-15 are obvious in view of the combination of Wang and Kudryavtsev
V Conclusion

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. 7,808,184 ("184 Patent") (Ex. 1001) against numerous parties in the District of Massachusetts. *See* List of Related Litigations (Ex. 1024). Petitioner is also filing additional Petitions for *Inter Partes* review in several patents that name the same alleged inventor. The below-listed claims of the '184 Patent are presently the subject of four substantially identical petitions for *inter partes* review with Case Nos. IPR2014-00455, IPR2014-00799, IPR2014-00855, and IPR2014-00995. Petitioner plans to seek joinder with IPR2014-00455.

C. Counsel

LEAD COUNSEL: David M. Tennant (Reg. No. 48,362).

BACKUP COUNSEL: Brian M. Berliner (Reg. No. 34549), Ryan K.



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