

Docket No. 1642930-0009 IPR5

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 IPR _____

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 7,147,759
CHALLENGING CLAIMS 22-33, 37, 46, 48 AND 50
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

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. 7,147,759 (“’759 Patent”) (Ex. 1301) against numerous parties in the District of Massachusetts. *See* List of Related Litigations (Ex. 1320). Petitioner is also filing additional Petitions for *Inter Partes* review in several patents related to the ’759 Patent.¹ The below-listed claims of the ’759 Patent are presently the subject of four substantially identical petitions for *inter partes* review with Case Nos. IPR2014-00446, IPR2014-00782, IPR2014-00850, and IPR2014-00986. Petitioner plans to seek joinder with IPR2014-00446.

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

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