

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RENESAS ELECTRONICS CORPORATION, RENESAS ELECTRONICS
AMERICA, INC., ADVANCED MICRO DEVICES, 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
Petitioner

v.

ZOND, INC.
Patent Owner

Case IPR2014-01063

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 6,853,142
CHALLENGING CLAIMS 22, 23, 25, 29, 30, 33-36, 39 AND 43
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

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

B. Related Matters

Zond has asserted U.S. Patent No. 6,853,142 (“’142 Patent”) (Ex. 1301)
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.*).
Petitioner is also filing additional Petitions for *Inter Partes* review in several
patents related¹ to the ’142 Patent.

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

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