

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.

Petitioner

v.

ZOND, INC.
Patent Owner

Case No. _____

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 7,604,716
CHALLENGING CLAIMS 14-18 AND 25-32
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. 7,604,716 (“’716 Patent”) (Ex. 1201) against numerous parties in the District of Massachusetts. 1:13-cv-11570-RGS; 1:13-cv-11577-DPW; 1:13-cv-11581-DJC); 1:13-cv-11591-RGS; 1:13-cv-11625-NMG; 1:13-cv-11634-WGY; and 1:13-cv-11567-DJC. Petitioner is filing Petitions for *Inter Partes* review in several patents related¹ to the ’716 Patent. The below-listed claims of the ’716 Patent are presently the subject of four similar petitions for *inter partes review* with Case Nos. IPR2014-00522, IPR2014-00807, IPR2014-00846, IPR2014-00974. Petitioner plans to seek joinder with IPR2014-00522.

C. Counsel

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

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