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. KH, TOSHIBA AMERICA, INC., TOSHIBA AMERICAN INFORMATION SYSTEMS, INC., AND TOSHIBA CORPORATON

Petitioner

v.

ZOND, LLC
Patent Owner

U.S. Patent No. 7,811,421

Inter Partes Review Case No. 2014-01071

PATENT OWNER's PRELIMINARY RESPONSE UNDER 37 CFR § 42.107(a)

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I. Introduction

The Petitioner has represented in a motion to joinder that this petition "is identical to the Intel IRP no. IRP2014-00470 in all substantive respects, includes identical exhibits, and relies upon the same expert declarant." Accordingly, based upon that representation, the Patent Owner opposes review on the same basis presented in opposition to Intel's request no. IRP2014-00470, which is reproduced below:

The present petition is the second of three petitions filed by Intel Inc. for *inter partes* review of U.S. Patent No. 7,811,421 ("the '421 patent"). The first (IPR 2014-00468) seeks cancellation of all independent claims (1, 17, 34, 46, 47, and 48), and selected dependent claims. This second petition seeks cancellation of six dependent claims (9, 14, 21, 26, 35, and 37), and a third petition (IPR 2014- 00474) seeks cancellation of the remainder.

This second petition relies on the same arguments and evidence presented against the parent claims in IPR 2014-00468, but adds new arguments and evidence directed to the dependent claims. Therefore, this second petition should be categorically denied for the exact same reasons given

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