

Docket No. 1642930-0003 IPR2

Filed on behalf of GLOBALFOUNDRIES U.S., Inc., GLOBALFOUNDRIES
Dresden Module One LLC & CO. KG, GLOBALFOUNDRIES Dresden Module
Two LLC & CO. KG

By: David M. Tennant, Reg. No. 48,362
White & Case LLP
701 Thirteenth Street, NW
Washington, DC 20005
Tel: (202) 626-3684
Email: dtennant@whitecase.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GLOBALFOUNDRIES U.S., INC., GLOBALFOUNDRIES DRESDEN
MODULE ONE LLC & CO. KG, GLOBALFOUNDRIES DRESDEN MODULE
TWO LLC & CO. KG
Petitioner

v.

ZOND INC.
Patent Owner

Case No. IPR2014-01076

**REVISED PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 6,805,779
CHALLENGING CLAIMS 5, 6, 8, 19, 22, 23, AND 43
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

TABLE OF CONTENTS

I. Mandatory Notices - 1 -
 A. Real Party-in-Interest - 1 -
 B. Related Matters - 1 -
 C. Counsel - 1 -
 D. Service Information - 1 -
II. Certification of Grounds for Standing - 2 -
III. Overview of Challenge and Relief Requested - 2 -
 A. Prior Art Patents and Printed Publications - 2 -
 B. Grounds for Challenge - 3 -
IV. Brief Description of Technology - 4 -
 A. Plasma - 4 -
 B. Ions, excited atoms, and metastable atoms - 5 -
V. Overview of the ‘779 Patent - 6 -
 A. Summary of Alleged Invention of the ‘779 Patent - 6 -
 B. Prosecution History - 10 -
VI. Overview of the Primary Prior Art References - 12 -
 A. Summary of the Prior Art - 12 -
 B. Overview of Mozgrin - 13 -
 C. Overview of Kudryavtsev - 14 -
 D. Overview of Iwamura - 15 -
 E. Overview of Pinsley and Angelbeck - 16 -
VII. Claim Construction - 17 -
 A. “multi-step ionization” - 17 -
VIII. Specific Grounds for Petition - 18 -
 A. Ground I: Claims 5, 6, 8, 19, 22, 23 and 43 would have been
 obvious in view of the combination of Mozgrin, Kudryavtsev
 and Pinsley - 18 -

1.	Independent claim 43	- 18 -
2.	Independent claim 1	- 33 -
3.	Independent claim 18	- 35 -
4.	Dependent claims 5, 6, 8, 19, 22 and 23	- 38 -
B.	Ground II: Claim 43 is anticipated by Iwamura	- 41 -
1.	Independent claim 43	- 41 -
C.	Ground III: Claims 5, 6, 8, 19, 22 and 23 would have been obvious in view of the combination of Iwamura and Angelbeck...	- 52 -
1.	Independent claim 1	- 52 -
2.	Independent claim 18	- 56 -
3.	Dependent claims 5, 6, 8, 19, 22 and 23	- 58 -
IX.	Conclusion.....	- 60 -

TABLE OF AUTHORITIES

	Pages
FEDERAL STATUTES	
35 U.S.C. § 312.....	Cover Page
REGULATIONS	
37 C.F.R. § 42.22.....	2
37 C.F.R. § 42.100.....	17
37 C.F.R. § 42.104.....	Cover page, 2, 18
CASE LAW	
<i>In re ICON Health & Fitness, Inc.</i> , 496 F.3d 1374, 1379 (Fed. Cir. 2007)..	17

I. MANDATORY NOTICES

A. Real Party-in-Interest

GLOBALFOUNDRIES U.S., Inc., GLOBALFOUNDRIES Dresden Module One LLC & Co. KG, GLOBALFOUNDRIES Dresden Module Two LLC & Co. KG (collectively, “Petitioner”) are the real parties-in-interest.

B. Related Matters

Zond has asserted U.S. Patent No. 6,805,779 (“’779 Patent”) (Ex. 1101) against numerous parties in the District of Massachusetts. *See* List of Related Litigations (Ex. 1113). Petitioner has filed Petition No. IPR2014-00598 for claims 1-4, 10-15, 17, 18, 24-27, and 29; and is also filing additional Petitions for *Inter Partes* review in several patents that name the same alleged inventor. The below-listed claims of the ’779 Patent are presently the subject of two substantially identical petitions for *inter partes* review with Case Nos. IPR2014-00686 and IPR2014-01019. Petitioner plans to seek joinder with IPR2014-00686.

C. Counsel

Lead Counsel: David M. Tennant (Reg. No. 48,362)

Backup Counsel: Dohm Chankong (Reg. No. 70,524)

D. Service Information

Pursuant to 37 C.F.R. § 42.8(b)(4), papers concerning this matter should be served on the following. Petitioner consents to electronic service.

David M. Tennant (Reg. No. 48,362)

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.