

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, and
THE GILLETTE COMPANY,
Petitioners,

v.

ZOND, LLC,
Patent Owner

Case IPR2014-01086¹
U.S. PATENT NO. 7,147,759

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Claims 1, 4, 10-12, 17, 18, and 44

¹ Case IPR2014-00981 has been joined with the instant proceeding.

Pursuant to 37 C.F.R. § 42.70(a), Petitioner respectfully requests oral argument on the issues set forth below at a place and time set by the Board. Oral argument is presently scheduled for June 8, 2015 (Paper No. 27, Decision on Motion to Designate Lead Petitioner and Amend Scheduling Order). To allow for a complete review of the issues presented in this proceeding, Petitioner requests the ability to use a computer, projector, and screen to display possible demonstratives and exhibits. Pursuant to 37 C.F.R. § 42.70, Petitioner specifies the following issues to be argued:

- I. Whether challenged claims 1, 4, 10 and 12 are unpatentable under 35 U.S.C. § 103(a) as obvious over Wang and Kudryavtsev.
- II. Whether challenged claim 11 is unpatentable under 35 U.S.C. § 103(a) as obvious over Wang, Kudryavtsev and Li.
- III. Whether challenged claim 17 is unpatentable under 35 U.S.C. § 103(a) as obvious over Wang, Kudryavtsev and Müller-Horsche.
- IV. Whether challenged claim 18 is unpatentable under 35 U.S.C. § 103(a) as obvious over Wang, Kudryavtsev and Kobayashi.
- V. Whether challenged claim 44 is unpatentable under 35 U.S.C. § 103(a) as obvious over Wang, Kudryavtsev and the Mozgrin Thesis.
- VI. Reply to any arguments raised in Patent Owner's Response.

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VII. Respond to any issues specified by Patent Owner in its request for oral argument.

VIII. Respond to Patent Owner's Presentation on all matters.

Dated: May 15, 2015

Respectfully submitted,

/s/David M. Tennant
David M. Tennant
Lead Counsel for Petitioner
GlobalFoundries
Registration No. 48,362

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), this is to certify that I caused to be served a true and correct copy of the foregoing "PETITIONER'S REQUEST FOR ORAL ARGUMENT" as detailed below:

Date of service May 15, 2015

Manner of service Email: bbarker@chsblaw.com;
gonsalves@gonsalveslawfirm.com; kurt@rauschenbach.com

Documents served PETITIONER'S REQUEST FOR ORAL ARGUMENT

Persons Served Bruce Barker
Chao Hadidi Stark & Barker LLP
176 East Mail Street, Suite 6
Westborough, MA 01581

Dr. Gregory J. Gonsalves
2216 Beacon Lane
Falls Church, Virginia 22043

/s/ Anna Goodall
Anna Goodall
White & Case LLP
3000 El Camino Real
Five Palo Alto Square, 9th Floor
Palo Alto, CA 94306
Tel: (650) 213-0367
Email: agoodall@whitecase.com