

Docket No. 1642930-0009 IPR2

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

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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. _____

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 7,147,759
CHALLENGING CLAIMS 2, 3, 5-9, 13-16, 19, 41-43 AND 45
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

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. 7,147,759 (“’759 Patent”) (Ex. 1101) against numerous parties in the District of Massachusetts. *See* List of Related Litigations (Ex. 1120). Petitioner is also filing additional Petitions for *Inter Partes* review in several patents that name the same alleged inventor. The below-listed claims of the ’759 Patent are presently the subject of two substantially identical petitions for *inter partes* review with Case Nos. IPR2014-00444 and IPR2014-00984. Petitioner plans to seek joinder with IPR2014-00444.

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.

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