

Paper No. \_\_\_\_\_

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioner

v.

ZOND, INC.  
Patent Owner

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Case IPR2014-01087<sup>1</sup>  
U.S. PATENT NO. 7,147,759  
Title: HIGH-POWER PULSED MAGNETRON SPUTTERING

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Before KEVIN F. TURNER, DEBRA K. STEPHENS, JONI Y. CHANG,  
SUSAN L.C. MITCHELL, and JENNIFER M. MEYER,  
*Administrative Patent Judges*

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**PETITIONER'S NOTICE OF PROPOSED MOTIONS**

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<sup>1</sup> Case IPR 2014-00984 has been joined with the instant proceeding.

**NOTICE OF PROPOSED MOTIONS**

The present notice of proposed motions is filed as a consolidated filing. The initial conference call in this proceeding is scheduled for October 27, 2014 at 2:00 p.m. Eastern Time. Pursuant to the instructions for initial conference calls set forth in the Office Trial Practice Guide, GLOBALFOUNDRIES U.S., Inc., GLOBALFOUNDRIES Dresden Module One LLC & Co. KG, and GLOBALFOUNDRIES Dresden Module Two LLC & Co. KG (collectively “GlobalFoundries” or “Petitioner”), provides the following notice regarding anticipated motions in this proceeding.

Proposed Motions: Petitioner has or will file a motion asking that the Board recognize Mr. Brett C. Rismiller as counsel *pro hac vice* during this proceeding for GlobalFoundries.

Petitioner does not presently intend to file any other motions but nevertheless reserves the right to file a motion to exclude evidence or a motion for observation on the dates set forth in the scheduling order for this case, as well as to request permission to file any other motions that become necessary as the case develops (e.g., a motion for discovery).

Also, it is noted that Petitioner and Patent Owner are discussing possible changes to the dates set forth in the scheduling order and may file a notice stipulating to such changes, if agreement is reached.

Petitioner's Notice of Proposed Motions  
IPR2014-01087 (U.S. 7,147,759)

Respectfully submitted,

Date: October 24, 2014

/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) and 42.105(a), this is to certify that I caused to be served a true and correct copy of the foregoing "PETITIONER'S NOTICE OF PROPOSED MOTIONS" as detailed below:

*Date of service* October 24, 2014

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

*Documents served* PETITIONER'S NOTICE OF PROPOSED MOTIONS

*Persons Served* Dr. Gregory J. Gonsalves  
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/s/ David M. Tennant

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