

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

Inter Partes Review Case No. IPR2014-01088¹

Patent 6,806,652 B2

**PATENT OWNER'S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION PURSUANT TO 37 C.F.R. § 42.10(c)**

This unopposed Motion for *Pro Hac Vice* admission is filed on behalf of Zond, LLC (“Zond” or “Patent Owner”). Zond respectfully moves that the Board recognize Dr. Maria Granovsky as counsel *pro hac vice* during this proceeding. Petitioners do not oppose this motion.

¹ Case IPR2014-01000 has been joined with the instant proceeding.

1. Time for Filing

This Motion for *Pro Hac Vice* Admission is being filed no sooner than twenty-one (21) days after service of the petition. *See Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper No. 7.

2. Statement of Facts Showing Good Cause for Admission of Counsel

Pro Hac Vice

Patent Owner has been authorized to file motions seeking admission *pro hac vice* under 37 C.F.R. 42.10(c). (Paper No. 3). Patent Owner's lead and back-up counsel are registered practitioners:

Lead Counsel: Tarek Fahmi, USPTO Reg. No. 41,402; and

Backup Counsel: Dr. Gregory J. Gonsalves, USPTO Reg. No. 43,639.

Dr. Granovsky is a skilled litigator, has extensively participated in the co-pending litigation in federal district court involving the patent at issue in this proceeding, and if admitted, will be involved with the depositions that occur in this proceeding. U.S. Patent No. 6,806,652 is currently asserted by the Patent Owner in co-pending litigation, in the District of Massachusetts, 1:13-cv-11577-LTS (*Zond v. AMD, et al.*) ("the co-pending litigation"). Dr. Granovsky is a member of the New York and Delaware bars in good standing, and is representing the Patent Owner in the co-pending litigation.

Dr. Granovsky has analyzed prior art references and claim charts in

connection with invalidity contentions and has been involved in forming claim construction positions related to the claimed inventions, all of which are relevant to the petition requesting *inter partes* review of U.S. Patent No. 6,806,652. Patent Owner wishes to apply Dr. Granovsky's knowledge of the patent by employing her as counsel in this proceeding. Admission of Dr. Granovsky *pro hac vice* will enable Patent Owner to avoid unnecessary expense and duplication of work between this proceeding and the co-pending litigation.

Patent Owner's lead and backup counsel are registered practitioners and Dr. Granovsky is an experienced litigation attorney having familiarity with the subject matter at issue in this proceeding. Therefore, Patent Owner respectfully submits that there is good cause for the Board to recognize Dr. Granovsky as counsel *pro hac vice* during this proceeding.

Given that there are 33 such petitions instituted over ten different patents, with numerous petitioners, Patent Owner needs additional attorneys admitted to be able to address the several depositions and related preparation that are expected to take place in the coming weeks.

3. Affidavit of Individual Seeking to Appear

This Motion for *Pro Hac Vice* Admission is supported by an Affidavit of Dr. Granovsky (Ex. 2001).

Date: February 24, 2015

Respectfully submitted,

/Tarek N. Fahmi/

Tarek Fahmi

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Counsel for Patent Owner Zond, LLC

PATENT OWNER'S EXHIBIT LIST IPR2014-01088

Exhibit No.	Description
Ex. 2001	Affidavit of Maria Granovsky in Support of Patent Owner's Motion for <i>Pro Hac Vice</i> Admission

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