

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 No. IPR2014-01088¹
Patent 6,806,652 B2

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT
37 C.F.R. § 42.70

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

Pursuant to 37 C.F.R. § 42.70(a), Patent Owner, Zond, LLC, 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 August 13, 2015 (Paper No. 18, Scheduling Order).

U.S. Patent 6,806,652 is also the subject of IPR2014-00861 and IPR2014-01089. Along with this Request for Oral Argument, Patent Owner is requesting oral argument in each of these concurrent proceedings. Because the issues presented in this IPR2014-01088 are similar to those presented in IPR2014-00861 and IPR2014-01089, involve the same parties, and the same cited references, Patent Owner requests that the oral hearings for IPR2014-00861, IPR2014-01088 and IPR2014-01089 be consolidated in a single hearing. To allow for a complete review of the issues presented in all of the pending proceedings, Patent Owner requests a total of one hour of argument time.

ISSUES TO BE ADDRESSED DURING CONSOLIDATED ORAL HEARING.

- A. Claims 1-14, 16-30, and 33-35 are patentable over Mozgrin, Kudryavtsev, Fahey, and Iwamura.
- B. Claim 5 is patentable over Mozgrin, Kudryavtsev, Fahey, Vratny, and Iwamura.

- C. Claims 8-10 are patentable over Mozgrin, Kudryavtsev, Fahey, Lantsman, and Iwamura.
- D. Claim 15 is patentable over Mozgrin, Kudryavtsev, Fahey, Wang, and Iwamura.
- E. Claims 31 and 32 are patentable over Mozgrin, Kudryavtsev, Fahey, Campbell, and Iwamura.
- F. Claims 18-30 are patentable over Mozgrin and Iwamura.
- G. Claims 31 and 32 are patentable over Mozgrin, Iwamura, and Campbell.
- H. Claims 33-35 are patentable over Mozgrin, Iwamura, and Fahey.

Date: July 17, 2015

Respectfully submitted,

/Tarek N. Fahmi/

Tarek N. Fahmi, Reg. No. 41,402
Ascenda Law Group, PC
333 W. San Carlos St., Suite 200
San Jose, CA 95110
1 866 877 4883
tarek.fahmi@ascendalaw.com

Counsel for Patent Owner Zond LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing

PATENT OWNER'S REQUEST FOR ORAL HEARING

was served on July 17, 2015, by filing this document through the Patent Review Processing System as well as delivering a copy via electronic mail directed to the attorneys of record for the Petitioner at the following address:

For Petitioner:

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

David M. Tennant
WHITE & CASE LLP
701 THIRTEENTH STREET, NW
WASHINGTON, DC 20005
dtennant@whitecase.com
dchankong@whitecase.com

For Petitioner:

THE GILLETTE COMPANY
David L. Cavanaugh, Reg. No. 36,476
Larissa Park, Reg. No. 59,051
Wilmer Cutler Pickering Hale and
Dorr LLP

60 State Street
Boston, MA 02109
Tel: (617) 526-5000

Email:
david.cavanaugh@wilmerhale.com;
Larissa.Park@wilmerhale.com

The parties have agreed to electronic service in this matter.

Respectfully submitted,

Date: July 17, 2015

by: /Tarek N. Fahmi/

Tarek N. Fahmi, Reg. No. 41,402

Ascenda Law Group, PC
333 W. San Carlos St., Suite 200
San Jose, CA 95110
1 866 877 4883