

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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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

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Case No. IPR2014-01089<sup>1</sup>  
Patent 6,806,652 B2

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

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<sup>1</sup> Case IPR2014-01004 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. 15, Scheduling Order).

U.S. Patent 6,806,652 is also the subject of IPR2014-00861 and IPR2014-01088. Concurrently with this Request for Oral Argument, Patent Owner is requesting oral argument in each of these concurrent proceedings. Because the issues presented in this IPR2014-01089 are similar to those presented in IPR2014-00861 and IPR2014-01088, 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.
- I. Claim 35 is patentable over Mozgrin, Kudryavtsev, Iwamura, and Fahey.

Date: July 20, 2015

Respectfully submitted,

/Bruce Barker/

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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing

### PATENT OWNER'S REQUEST FOR ORAL HEARING

was served on July 20, 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.,  
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The parties have agreed to electronic service in this matter.

Respectfully submitted,

Date: July 20, 2015

by: /Bruce Barker/

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