

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GLOBAL FOUNDRIES 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. IPR2014-01100<sup>1</sup>

Patent 7,604,716 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 IPR 2014-00973 has been joined with the instant proceeding.

Pursuant to 37 C.F.R. § 42.70(a), Patent Owner, Zond, LLC, respectfully requests oral argument at a place and time set by the Board. Oral argument is presently scheduled for June 12, 2015 (Paper No. 10, Scheduling Order).

The present proceeding involves U.S. Patent 7,604,716, which is also at issue in IPR2014-00807, IPR2014-00808, and IPR2014-01099. Concurrently with this request for oral argument, similar requests are being filed in each of these related proceedings. Patent Owner requests that, for the convenience of the parties and the Board, a single oral hearing be conducted on all the issues in these proceedings, as set forth below. To allow for a complete review of these issues, Patent Owner requests one hour of argument time.

#### **ISSUES TO BE ADDRESSED DURING ORAL ARGUMENT**

- A. Claims 1-11, and 33 are patentable under 35 U.S.C. § 102 over Wang (IPR2014-01099);
- B. Claims 12 and 13 are patentable under 35 U.S.C. § 103(a) over Wang and Lantsman (IPR2014-01100);
- C. Claims 14-18 and 25-32 are patentable under 35 U.S.C. § 103(a) over Wang and Kudryavtsev (IPR2014-00807);
- D. Claim 21 is patentable under 35 U.S.C. § 103(a) over Wang and Kudryavtsev (IPR2014-00808);

- E. Claims 19 and 20 are patentable under 35 U.S.C. § 103(a) over Wang, Kudryavtsev, and Lantsman (IPR2014-00808); and
- F. Claims 22-24 are patentable under 35 U.S.C. § 103(a) over Wang, Kudryavtsev, and Mozgrin (IPR2014-00808).

Date: May 15, 2015

Respectfully submitted,

/Tarek N. Fahmi/

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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 May 15, 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:

THE GILLETTE COMPANY

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The parties have agreed to electronic service in this matter.

Respectfully submitted,

Date: May 15, 2015

by: /Tarek N. Fahmi/

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