UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.,

TSMC NORTH AMERICA CORP.,

FUJITSU SEMICODUCTOR LIMITED AND

FUJITSU SEMICONDUCTOR AMERICA, INC.

Petitioners

v.

ZOND, LLC
Patent Owner

U.S. Patent No. 6,896,773

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Inter Partes Review Case Nos:

IPR Nos. 2014-(1479, 1481)

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PATENT OWNER's OPPOSITION TO MOTION FOR JOINDER

ARGUMENT

Zond LLC ("Zond") has not yet filed a Preliminary Response in this matter and therefore reserves to the right to oppose joinder on any grounds raised in its Preliminary Response. However, Zond notes here that the terms of Joinder proposed in Petitioner's motion are potentially ambiguous as to the page limitations of the proposed consolidated filings. Zond therefore proposes, without waiving any objections it may raise in its preliminary response, that the terms of any joinder clearly state that the consolidated filings will be made in accordance with the Board's established rules regarding **page limits for a single party**:

PROPOSED ORDER

For purposes of this Proposed Order, the term "Joined Petitioners" shall refer to all parties who are joined in the Lead Petitioner's IPR, including Lead Petitioner and all entities subsequently joined in any proceeding resulting from the Lead Petitioner's petition. The term "Copied IPR" shall refer to a petition that is a copy of Lead Petitioner's petition.

ZOND proposes joinder under the following conditions:

- If review is instituted on any ground in the Lead Petitioner's IPR, each Copied IPR will be instituted on the same grounds and will

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be joined with the Lead Petitioner's IPR. Grounds not instituted in the Lead Petitioner's IPR will be similarly denied in the Copied IPR.

- The scheduling order for the Lead Petitioner's IPR will apply in the joined proceeding.

- Throughout the proceeding, the Joined Petitioners will file papers as consolidated filings, except for motions that do not involve the other parties, in accordance with the Board's established rules regarding page limits for one party. So long as any Joined Petitioners continue to participate in the joined proceeding, all such remaining Joined Petitioners will continue to file their papers as consolidated filings and will be responsible for completing all consolidated filings.

- The Joined Petitioners will designate an attorney to conduct the cross examination of any given witness produced by Zond, and the redirect of any given witness produced by the Joined Petitioners, within the timeframe normally allotted by the rules for one party. The Joined Petitioners will not receive any separate cross-examination or redirect time.

- Zond will conduct any cross examination of any given witness jointly produced by Joined Petitioners and the redirect of any given witness produced by Zond within the timeframe normally allotted by the rules for one cross-examination or redirect examination.[1]

Date: September 26, 2014

Respectfully submitted,

/Gregory J. Gonsalves/

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[1] Lastly, Zond also respectfully asks to reserve the right to request even further consolidation after the Board's decisions on whether to institute review in response to the various Lead Petitioner petitions on the same patent.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Patent Owner'

Revised Opposition to Motion for Joinder was served via email on September

26, 2014, on the attorneys for all Petitioners:

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