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Filed on behalf of: Taiwan Semiconductor Manufacturing Company, Ltd.;
TSMC North America Corp.;
Fujitsu Semiconductor Limited; and
Fujitsu Semiconductor America, Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.
TSMC NORTH AMERICA CORP.
FUJITSU SEMICONDUCTOR LIMITED
FUJITSU SEMICONDUCTOR AMERICA, INC.
Petitioner

v.

Patent Owner of
U.S. Patent No. 6,896,775 to Roman Chistyakov

IPR Trial No. TBD

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 6,896,775
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

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I. MANDATORY NOTICES

A. Real Party-in-Interest

Taiwan Semiconductor Manufacturing Company, Ltd.; TSMC North America Corp.; Fujitsu Semiconductor Limited; and Fujitsu Semiconductor America are the real parties-in-interest (“Petitioner”).

B. Related Matters

The ‘775 patent is involved in the following related matters: *Zond, LLC v. Fujitsu Semiconductor Limited et al.*, Civ. No. 1-14-cv-12438 (MAD June 9, 2014); *TSMC Tech., Inc. et al v Zond LLC*, Civ. No. 1-14-cv-00721 (DED June 6, 2014); *Zond, Inc. v. The Gillette Co. and the Procter and Gamble Co.*, Civ. No. 1:13-CV. 11567-DJC (MAD, July 1, 2013); IPR2014-00578 filed April 4, 2014; and IPR2014-00604 filed April 10, 2014. The present petition is substantially identical to IPR2014-00604, and Petitioner plans to seek joinder therewith. Additionally, the Patent Owner is suing Petitioner and/or other parties under one or more of U.S. Patent Nos. 7,147,759; 6,896,775; 6,853,142; 7,604,716; 8,125,155; 7,811,421; 6,805,779; 7,808,184; 6,806,652, and 6,896,773 all of which have generally similar subject matter.

C. Counsel

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