

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioner

v.

ZOND, LLC
Patent Owner

U.S. Patent No. 6,896,775

Inter Partes Review Case No. 2014-01494

**PATENT OWNER'S MOTION FOR COUNSEL TO
WITHDRAW FROM THE PROCEEDING AND PERMIT
SUBSTITUTION OF COUNSEL**

I. STATEMENT OF PRECISE RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10, Patent Owner Zond, LLC ("Zond") respectfully requests that the Patent Trial and Appeal Board ("the Board") authorize withdrawal of its current lead counsel, Bruce J. Barker, and substitution of new lead counsel, Tarek Fahmi.

II. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO AUTHORIZE WITHDRAWAL OF COUNSEL

Bruce Barker was appointed by Zond as its attorney for the above-captioned inter partes review. Patent Owner Zond now requests that current designated counsel be allowed to withdraw from the present proceeding, and that new counsel listed below be substituted as lead counsel for Zond in this proceeding.

Lead Counsel:

Tarek Fahmi
Reg. No. 41,402
84 W. Santa Clara Street, Suite 550
San Jose, CA 95113
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Mr. Fahmi meets the requirements of 37 C.F.R. § 42.10(c) as lead counsel and is a registered practitioner. In addition Mr. Fahmi has read and intends to comply with the Patent Office Trial Practice Guide and the Board's Rules of Practice for Trials, as set forth in Part 42 of the C.F.R.

Accordingly, Patent Owner Zond respectfully requests that the Board grant its motion to authorize withdrawal of counsel. Upon grant of this motion, current counsel for Zond will promptly file a new Power of Attorney (as attached hereto) and an Amended Mandatory Notice Information.

Date: November 3, 2014

Respectfully submitted,

/Bruce Barker/

Bruce Barker
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ZOND, LLC,
Patent Owner

Case IPR2014 – 01494
U.S. Patent 6,896,775

POWER OF ATTORNEY FOR ZOND, LLC

The undersigned duly authorized representative of Zond, LLC hereby appoints the following practitioners as its representatives before the United States Patent and Trademark Office in connection with Case No. IPR2014-01494:

Lead Counsel	Back-up Counsel
Tarek Fahmi Reg. No. 41,402 84 W. Santa Clara Street, Suite 550 San Jose, CA 95113 408-799-0612 tarek.fahmi@ascendallaw.com	Dr. Gregory J. Gonsalves Reg. No. 43,639 2216 Beacon Lane Falls Church, Virginia (571) 419-7252 gonsalves@gonsalveslawfirm.com

Date: November 3, 2014

Respectfully submitted


For: Zond, LLC

Name: Bassam Abraham

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Patent Owner's Motion For Counsel To Withdraw From The Proceeding and Permit Substitution Of Counsel and the associated Power of Attorney documents were served via email on November 3, 2014, on the attorneys for the Petitioner:

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