

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ZOND, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:13-CV-11567-DJC
	)	
THE GILLETTE COMPANY and	)	
THE PROCTER & GAMBLE COMPANY,	)	
	)	
Defendants.	)	

**THE GILLETTE COMPANY’S AND THE PROCTER & GAMBLE COMPANY’S
MOTION FOR LEAVE TO FILE A SUPPLEMENTAL MEMORANDUM IN SUPPORT
OF THEIR MOTION TO STAY PENDING INTER PARTES REVIEW**

Pursuant to Local Rule 7.1(b)(3), defendants The Gillette Company and The Procter & Gamble Company (collectively, “Gillette”) move for leave to file a supplemental memorandum in support of their Motion to Stay Pending *Inter Partes* Review (Dkt. No. 67). Gillette moves for leave to submit a supplemental memorandum to inform the Court about recent developments that address and affirmatively rebut certain arguments plaintiff Zond, LLC (“Zond”) made in its May 16, 2014 opposition to Gillette’s motion to stay (Dkt. No. 81). Gillette’s proposed supplemental memorandum is attached hereto as **Exhibit 1**. Zond has indicated that it opposes this motion.

WHEREFORE, Gillette respectfully requests that the Court grant its motion for leave to file a supplemental memorandum in support of its Motion to Stay Pending *Inter Partes* Review.

Dated: July 16, 2014

Respectfully submitted,

/s/ Christopher R. Noyes

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

I, Christopher R. Noyes, hereby certify that counsel for The Gillette Company and The Procter & Gamble Company conferred in good faith via email with counsel for Zond, LLC to resolve or narrow the issues presented in this motion. Counsel for Zond, LLC indicated that it opposes Gillette's motion for leave to file a supplemental memorandum.

/s/ Christopher R. Noyes

CERTIFICATE OF SERVICE

I, Christopher R. Noyes, hereby certify that on July 16, 2014 a true and correct copy of the foregoing The Gillette Company's and The Procter & Gamble Company's Motion for Leave to File a Supplemental Memorandum in Support of Their Motion to Stay Pending *Inter Partes* Review was served by ECF upon all counsel of record for Zond, LLC.

/s/ Christopher R. Noyes