

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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McClinton Energy Group L.L.C.  
Petitioner

v.

Magnum Oil Tools International, Ltd.  
Patent Owner

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Case No. IPR2013-00231  
Patent 8,079,413

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**PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE**

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## **I. Statement of Relief Requested**

McClinton Energy Group L.L.C. (“Petitioner” or “McClinton”) respectfully requests that claims 1 to 20 of U.S. Patent No. 8,079,413 (“the ‘413 Patent,” Exhibit 1001) be canceled on the grounds in the September 23, 2013 Decision instituting *inter partes* review (“Decision”).

## **II. Background**

McClinton’s Petition set forth a prima facie case for invalidity of claims 1-20 of the ‘413 Patent under 35 U.S.C. § 103(a) on multiple grounds. The Board found that the Petition likely demonstrates that:

- (1) claims 1-3, 5-8, 12, and 13 are unpatentable over the combination of Lehr, Cockrell, and Kristiansen;
- (2) claims 4 and 9-11 are unpatentable over the combination of Lehr, Cockrell, Kristiansen, and Slup;
- (3) claims 14 and 16 are unpatentable over the combination of Lehr, Cockrell, Kristiansen, and Streich;
- (4) claim 15 is unpatentable over the combination of Lehr, Cockrell, Kristiansen, Streich, and McKeachnie;
- (5) claims 17-19 are unpatentable over the combination of Lehr, Cockrell, Kristiansen, Slup, and Streich; and

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