

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GREENE'S ENERGY GROUP, LLC
Petitioner

v.

OIL STATES ENERGY SERVICES, LLC
Patent Owner

Case IPR2014-00216
Patent 6,179,053

Case IPR2014-00364
Patent 6,289,993

**PATENT OWNER'S OBJECTIONS TO PETITIONER'S
DEMONSTRATIVES**

Pursuant to the Order regarding Trial Hearing on January 16, 2015, Patent Owner Oil States Energy Services, LLC ("OSES") timely objects to Petitioner's demonstrative exhibit submission on February 4, 2015 (Ex. 1029). Patent Owner's objections are set forth with particularity below.

Objections	Slides
Argumentative characterizations	<p>The following slides contain argumentative characterizations:</p> <ul style="list-style-type: none">• IPR2014-00216<ul style="list-style-type: none">○ Slides 8, 15, 17, 21, 22, 23, 25-29, 33, 36-39, 42, 44, 45, 48, 49, 50.○ For example, slides 17, 23, 33, and 42 each contain several argumentative characterizations, while other listed slides include at least one argumentative characterization.• IPR2014-00364<ul style="list-style-type: none">○ Slides 59-60, 65, 67, 70, 72, 77-79○ For example, slides 65, 70, and 72 each contain several argumentative characterizations, while other listed slides include at least one argumentative characterization.
Mischaracterizes the Record	<p>The following slides contain citations or arguments that mischaracterize the record.</p> <ul style="list-style-type: none">• IPR2014-00216<ul style="list-style-type: none">○ Slides 22, 24, 26, 29, 36-40, 42-45, 48○ For example, slides 38 and 39 are contrary to deposition testimony provided by petitioner's expert.

Objections	Slides
	<ul style="list-style-type: none">• IPR2014-00364<ul style="list-style-type: none">○ Slides 67-68, 89, 93○ For example, slide 93 mischaracterizes the deposition testimony of Dr. Wooley.
Arguments Not Previously Presented	<p>The following slides contain arguments that were not previously presented or not presented in the original respective petition.</p> <ul style="list-style-type: none">• IPR2014-00216<ul style="list-style-type: none">○ Slides 20, 21, 40, 45, 49○ For example, slide 45 references that McLeod “[t]eaches [a] mechanical lockdown mechanism is superior to [a] hydraulic lockdown,” which is an assertion not previously made in any paper.• IPR2014-00364<ul style="list-style-type: none">○ Slides 70, 77, 89-93○ For example, slides 89-93 contain arguments not presented in the original Petition.
Unsupported by Citations to Evidence	<p>The following slides either do not include any citations at all or do not include any citations to evidence:</p> <ul style="list-style-type: none">• IPR2014-00216<ul style="list-style-type: none">○ Slides 6, 8, 11, 12, 17, 22-29, 33, 40, 42, 44○ For example, slide 17 does not includes any cites at all, while other slides do not cite to evidence.• IPR2014-00364<ul style="list-style-type: none">○ Slides 65, 70, 73○ For example, slide 65 does not includes any cites at all, while other slides do not cite to evidence.

Objections	Slides
Cited Support is Inapplicable or Overly Ambiguous	<p>The following slides cite to support that is inapplicable or overly ambiguous:</p> <ul style="list-style-type: none">• IPR2014-00216<ul style="list-style-type: none">○ Slides 8, 16, 23, 36-40, 42, 44, 45○ For example, slides 36 and 37 quote deposition testimony from Dr. Wooley that is inapplicable to the point being made.• IPR2014-00364<ul style="list-style-type: none">○ Slides 67-68, 89, 90○ For example, slide 68 characterizes deposition testimony from Dr. Wooley in a manner that exceeds what was actually said.

Dated: February 9, 2015

Respectfully submitted,

/C. Erik Hawes/

C. Erik Hawes
Registration No. 63,328
ehawes@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
1000 Louisiana Street, Suite 4000
Houston, Texas 77002
T. 713.890.5165
F. 713.890.5001

Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of Patent Owner's Objections to Petitioner's Demonstratives have been served via email, as previously agreed, to counsel for Petitioner on the 9th day of February, 2015 at the following email addresses:

John J. Feldhaus
jfeldhaus@foley.com

Andrew R. Cheslock
acheslock@foley.com

Bradley Roush
broush@foley.com

Dated: February 9, 2015

Respectfully submitted,

/C. Erik Hawes/
C. Erik Hawes
Registration No. 63,328
Counsel for Patent Owner