

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 No. 6,179,053

PATENT OWNER RESPONSE
UNDER 37 C.F.R. § 42.120

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TABLE OF CITED EXHIBITS

Exhibits (including previously cited Exhibits)	Description
1001	U.S. Patent No. 6,179,053
1002	Declaration of Donald Shackelford
1003	Canadian Patent Application No. 2,195,118
2001	U.S. Patent No. 5,819,851 (issued Oct. 13, 1998), <i>Blowout Preventer Protector for Use During High Pressure Oil/Gas Well Stimulation</i>
2008	Memorandum Opinion and Order, Dkt. 92, June 23, 2014, <i>Oil States Energy Services LLC v. Trojan Wellhead Protection, Inc. and Greene's Energy Group, LLC</i> , 6:12-cv-611, Eastern District of Texas, Tyler Division ("Markman Order")
2012	Declaration of Gary R. Wooley
2013	Declaration of Murray L. Dallas
2014	Declaration of Bob McGuire
2015	Deposition Transcript of Donald W. Shackelford
2016	Random House Webster's Unabridged Dictionary (2nd ed. 2001), p. 1128

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I. INTRODUCTION

On December 3, 2013, Greene’s Energy Group, LLC (“GEG” or “Petitioner”) filed a petition¹ for *inter partes* review (“Petition”) seeking cancellation of claims 1 and 22 of U.S. Patent No. 6,179,053 (“the ’053 Patent”) (Pet. Ex. 1001). Patent Owner Oil States Energy Services, L.L.C. (“OSES or “Patent Owner”) filed a timely Preliminary Response on March 13, 2014. The Patent Trial and Appeal Board ultimately instituted *inter partes* review on both claims 1 and 22 as described in the decision to institute *inter partes* review (“Institution Decision”) issued on June 10, 2014. However, the Board granted trial as to only one ground presented in the Petition: the alleged anticipation of claims 1 and 22 of the ’053 Patent by Canadian Patent Application No. 2,195,118 (“the ’118 Application”) (Pet. Ex. 1003), which was Ground 2 of the Petition. The Board denied the two other grounds presented in the Petition.

Patent Owner respectfully submits its Response under 37 C.F.R. § 42.120 to address Ground 2 of the Petition as well as to address comments made by the Board in the Institution Decision. In support of this Response, Patent Owner submits the Declaration of Dr. Gary Wooley, dated August 26, 2014 (“Wooley Decl.”) (Ex. 2012), which details his technical analysis of the challenged claims.

¹ Petitioner filed a Reformatted Petition on January 17, 2014. All citations to the Petition are to the Reformatted Petition, Paper No. 6.

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