

Paper No. _____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GREENE'S ENERGY GROUP, LLC

Petitioner

v.

OIL STATES ENERGY SERVICE, L.L.C.

Patent Owner

Patent No. 6,179,053

Issue Date: January 30, 2001

Title: LOCKDOWN MECHANISM FOR WELL TOOLS REQUIRING FIXED-
POINT PACKOFF

Inter Partes Review No. Unassigned

DECLARATION OF DON W. SHACKELFORD

1. I, Don W. Shackelford, a resident of Houston, Texas, hereby declare as follows:

2. I have been retained by Foley & Lardner LLP to provide my opinion concerning the validity of U.S. Pat. No. 6,179,053 (“the '053 patent”) (Ex. 1001). I am being compensated for my time at the rate of \$400 per hour.

3. My declaration contains the following sections:

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I. Introduction And Qualifications

4. I am a retired Senior Well Control Engineer with Boots and Coots (International Well Control)(now a division of Halliburton Services). I received my Bachelor’s and Master’s degrees in Mechanical Engineering from Texas Tech University in 1969 and 1972, respectively. I have over 40 years of experience in the oil and gas well industry, starting with my first position as an engineer with Halliburton Services following conferral of my undergraduate engineering degree. During that time, I have accrued significant engineering experience in the field including jobs with Domestic General Services that involved well fracturing and the use of wellhead isolation tools, as explained in more detail by my resume, which is appended to this declaration.

5. In addition to my practical engineering experience, I have been the recipient of a number of achievement awards throughout my career, all of which

are listed in my attached resume. I have also authored or co-authored a number of published technical papers directed to engineering aspects of the oil and gas industry. Additionally, I am the named inventor named on two issued U.S. patents relating to oil and gas well technology (U.S. Pat. Nos. 5,209,108 and 4,850,108). Lastly, I am also a distinguished member of a variety of professional organizations including the Society of Petroleum Engineers of which I have been a member for over 10 years.

II. Understanding of the Governing Law

A. Types Of Claims – Independent And Dependent

6. I understand that there are two types of U.S. patent claims: 1) independent claims and 2) dependent claims. I understand that independent claims only include the aspects stated in the independent claim. I further understand that dependent claims include the aspects stated in that dependent claim, and any other aspects stated in any claim from which that dependent claim depends.

B. Invalidity By Anticipation Or Obviousness

7. I understand that a claim is invalid if it is anticipated or obvious. I understand that anticipation of a claim requires that every element of a claim is disclosed expressly or inherently in a single prior art reference, arranged as in the claim.

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