

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

**PETITION FOR *INTER PARTES* REVIEW
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 *ET. SEQ.***

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EXHIBIT LIST

Ex. #	Exhibit
1001	U.S. Pat. No. US 6,179,053 (“‘053 Patent”)
1002	Declaration of Mr. Don Shackelford
1003	Canadian Pat. Appl. 2,195,118 (“Dallas”)
1004	U.S. Pat. No. 4,632,183 (“McLeod”)
1005	U.S. Pat. No. 4,076,079 (“Herricks”)
1006	U.S. Pat. No. 2,927,643 (“Dellinger”)
1007	Declaration of John J. Feldhaus

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Petition For *Inter Partes* Review
US. Patent No. 6,179,053

NOTICE OF LEAD AND BACKUP COUNSEL

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NOTICE OF EACH REAL-PARTY-IN-INTEREST

The real-parties-in-interest for this Petition is Greene's Energy Group LLC.

NOTICE OF RELATED MATTERS

The '053 patent is asserted in *Oil States energy Service, L.L.C., et al. v.*

Greene's Energy Group, LLC, Civil Action No.: 6:12-CV-611 (E.D. Tex).

NOTICE OF SERVICE INFORMATION

Please address all correspondence to the lead counsel at the address shown above. Petitioner also consents to electronic service by email at:

jfeldhaus@foley.com and acheslock@foley.com

GROUND FOR STANDING

Petitioner hereby **certifies** that the patent for which review is sought is available for *inter partes* review and that the Petitioner is not barred or estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in the petition.

STATEMENT OF PRECISE RELIEF REQUESTED

The Petitioner respectfully requests that claims 1 and 22 of U.S. Patent No. 6,179,053 (“the ‘053 patent”)(Ex. 1001) be canceled based on the following grounds of unpatentability, explained in detail (including relevant claim constructions) in the next section.

Ground 1. Claims 1 and 22 are invalid under § 103(a) over Dallas (Ex. 1003) in view of McLeod (Ex. 1004).

Ground 2. Claims 1 and 22 are invalid under § 102(b) over Dallas.

Ground 3. Claims 1 and 22 are invalid under § 103(a) over Herricks (Ex. 1005) in view of Dellinger (Ex. 1006).

THRESHOLD REQUIREMENT FOR *INTER PARTES* REVIEW

A petition for *inter partes* review must demonstrate "a reasonable likelihood that the petitioner would prevail with respect to at least 1 of the claims challenged in the petition". 35 U.S.C. § 314(a). The Petition meets this threshold. Each of the elements of claims 1 and 22 of the ‘053 patent are taught in the prior art as explained below in the proposed grounds of unpatentability. Additionally, the reasons to combine are established for each ground under 35 U.S.C. § 103(a).

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