

Filed on behalf of Petroleum Geoservices, Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PETROLEUM GEO-SERVICES INC.
Petitioner
v.

WESTERNGECO LLC
Patent Owner

CASE IPR: Unassigned

**PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,080,607
UNDER 35 U.S.C. §§ 311-319 and 37 C.F.R. §§ 42.1-.80, 42.100-.123**

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I. INTRODUCTION

Pursuant to 35 U.S.C. § 311 and 37 C.F.R. § 42.100, Petroleum Geo-Services, Inc. (“Petitioner”) requests *Inter Partes* review of Claims 1 and 15 of U.S. Patent No. 7,080,607 (the “’607 Patent”) (Ex. 1001¹), assigned on its face to WesternGeco L.L.C. (“Patent Owner”). Accompanying this petition are the declarations of Drs. Brian Evans (Ex. 1002) (“Evans”) and Jack Cole (Ex. 1003) (“Cole”). This Petition and its accompanying declarations demonstrate that there is a reasonable likelihood that Petitioner will prevail with respect to the challenged claims, and thus a trial for *Inter Partes* review must be instituted. Evidence presented and cited in this petition establishes that Claims 1 and 15 are unpatentable under 35 U.S.C. §§ 102 and 103. Therefore, Petitioner respectfully requests that these claims be judged unpatentable and canceled.

II. OVERVIEW

The ’607 Patent is directed to marine seismic surveying technology. Marine seismic surveys are carried out by vessels that tow acoustic energy sources that fire “shots” of sound waves into the water. The sound waves travel through the seafloor and into the earth, reflect from the earth’s geological formations, and return to the surface. The reflected signals are then recorded by acoustic sensors (“receivers” or “hydrophones”) that are towed in long cables known as seismic

¹ Citation to “Ex. ____” in this Petition refers the PGS Exhibits attached hereto.

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