

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

PETROLEUM GEO-SERVICES INC.  
and  
ION GEOPHYSICAL CORPORATION  
AND ION INTERNATIONAL S.A.R.L.  
Petitioners

v.

WESTERNGECO, LLC  
Patent Owner

---

Case IPR2014-00688<sup>1</sup>

U.S. Patent No. 7,080,607

---

**PETROLEUM GEO-SERVICES INC.'S OBJECTIONS TO EVIDENCE**

---

<sup>1</sup> Case IPR2015-00567 has been joined with this proceeding.

Petitioner Petroleum Geo-Services Inc. (“PGS”) objects pursuant to 37 C.F.R. § 42.64(b)(1) and the Federal Rules of Evidence (“FRE”) to the admissibility of evidence served by Patent Owner WesternGeco, LLC on June 22, 2015. PGS files these objections pursuant to 37 C.F.R. § 42.64(b)(1), which—as of May 19, 2015—requires objections to be filed with the Board. *See* 80 F.R. 28,561, 28,563. Nothing contained herein shall be deemed to withdraw any objection in PGS’ Objections to Evidence—including to Exhibits 2141, 2142, 2151, 2152, 2153-56, and 2161—previously served on Patent Owner on March 27, April 16, May 6, May 28, and June 8, 2015.

The exhibits objected to, and grounds for PGS’ objections, are listed below. PGS also objects to Patent Owner’s reliance on or citation to any objected evidence in its papers.

**I. IDENTIFICATION OF CHALLENGED EVIDENCE AND GROUNDS FOR OBJECTIONS**

**A. Exhibit 2163**

PGS objects to Exhibit 2163, the Third Declaration of Timothy Gilman, under FRE 402 and FRE 403 because it is irrelevant and its probative value is substantially outweighed by the danger of wasting time in this compressed proceeding. Exhibit 2163 purports to authenticate various exhibits. Exhibit 2163 is irrelevant to the extent that it attempts to authenticate irrelevant exhibits.

Exhibit 2163 is also irrelevant to the extent that it does not cure the objections identified in PGS' Objections to Evidence of June 8, 2015.

PGS further objects to Exhibit 2163 under FRE 402, 403 and 602 to the extent that Mr. Gilman provides comments that are outside his personal knowledge or lack foundation.

Nothing herein shall be deemed to withdraw any of PGS' objections to exhibits referenced in Exhibit 2163.

#### **B. Exhibit 2165**

PGS objects to Exhibit 2165, the Second Declaration of Michael Kiklis, under FRE 402 and FRE 403 because it is irrelevant and its probative value is substantially outweighed by the danger of wasting time in this compressed proceeding. Exhibit 2165 purports to authenticate an exhibit. Exhibit 2165 is irrelevant to the extent that it attempts to authenticate irrelevant exhibits. Exhibit 2165 is also irrelevant to the extent that it does not cure the objections identified in PGS' Objections to Evidence of June 8, 2015.

Nothing herein shall be deemed to withdraw any of PGS' objections to exhibits referenced in Exhibit 2165.

## **II. CONCLUSION**

To the extent Patent Owner fails to correct the defects identified above, PGS may file a motion to exclude under 37 C.F.R. § 42.64(c).

Dated: June 29, 2015

Respectfully submitted,

/Jessamyn Berniker/

Jessamyn Berniker

Reg. No. 72,328

Williams & Connolly LLP

725 Twelfth Street, N.W.

Washington, DC 20005

Phone: 202-434-5474

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the above-captioned *Petroleum Geoservices Inc.'s Objections to Evidence* was served on June 29, 2015, by delivering a copy via electronic mail upon the following attorneys of record.

For Petitioner ION Geophysical Corporation and ION International S.A.R.L.:

W. Karl Renner  
Roberto Devoto  
IPR37136-0003IP1@fr.com

Fish & Richardson P.C.  
3200 RBC Plaza  
60 South Sixth Street  
Minneapolis, MN 55402  
202-783-5070

For Patent Owner:

Michael L. Kiklis  
CPDocketKiklis@oblon.com  
Scott McKeown  
CPDocketMcKeown@oblon.com  
Kevin Laurence  
CPDocketLaurence@oblon.com  
Katherine Cappaert  
CPDocketCappaert@oblon.com  
Christopher Ricciuti  
CPDocketRicciuti@oblon.com

Oblon  
1940 Duke Street  
Alexandria, Virginia 22314  
703-413-3000

Dated: June 29, 2015

Respectfully submitted,

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.