

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PETROLEUM GEO-SERVICES INC.,
Petitioner

v.

WESTERNGECO LLC
Patent Owner

Cases

IPR2014-00687 (U.S. Patent No. 7,162,967)
IPR2014-00688 (U.S. Patent No. 7,080,607)
IPR2014-00689 (U.S. Patent No. 7,293,520)

SECOND SUPPLEMENTAL DECLARATION OF ROBIN C. WALKER

Pursuant to 28 U.S.C. § 1746, I, Robin C. Walker, the undersigned, hereby declare as follows:

1. My name is Robin C. Walker. I am over eighteen years of age, of sound mind, and in all ways qualified and competent to make this declaration. I have personal knowledge of the facts contained in this declaration and they are true and correct.

2. I have worked in the marine seismic industry for 30 years in technical, research and customer-facing roles. Through my experience, I have developed first-hand knowledge of the technologies that have driven customer demand and enabled effective acquisition techniques in this industry. During my 30 year tenure at Schlumberger, I rose to be the Vice President of Sales and Marketing Director for WesternGeco from March 2008 to March 2013 and a Global Account Director for Schlumberger from March 2013 to January 2015. I am

particularly knowledgeable about the development, marketing and sales of WesternGeco's Q-Marine System and the market's reception of Q-Marine and other systems that practice the patents I understand to be at issue in this proceeding ("Bittleston patents").

3. Exhibit 2129 is a true and correct copy of my trial demonstratives in the *WesternGeco L.L.C. v. ION Geophysical Corp. et al.*, Civ. No. 09-1827 (S.D. Tex.) litigation.

4. Exhibit 2130 is a true and correct copy of email correspondence dating from 2007 with subject line "Libya Technical Seminar," in which I participated during my time at WesternGeco. This correspondence was made and kept in the ordinary course of WesternGeco's business.

5. Exhibit 2131 is a true and correct copy of an excel spreadsheet that I authored between 1994 and 1996 during my time at WesternGeco. This spreadsheet was made and kept in the ordinary course of WesternGeco's business.

6. Exhibit 2132 is a true and correct copy of a spreadsheet dating from 2010 titled "Tims stats 2005 to 2009 Retrieve 1" that was produced by employees at WesternGeco and that I received during my time at WesternGeco. This spreadsheet was made and kept in the ordinary course of WesternGeco's business.

7. Exhibit 2133 is a true and correct copy of an email dating from 2004 with subject line "AKPO/COMBO," which I received during my time at WesternGeco. This correspondence was made and kept in the ordinary course of WesternGeco's business.

8. Exhibit 2134 is a true and correct copy of an email dating from 2002 with subject line "Status report for May, 2002," which I received during my time at WesternGeco. This correspondence was made and kept in the ordinary course of WesternGeco's business.

