

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.

Cases¹

IPR2014-00687 (Patent No. 7,162,967)

IPR2014-00688 (Patent No. 7,080,607)

IPR2014-00689 (Patent No. 7,293,520)

**PATENT OWNER'S RESPONSE TO
PETROLEUM GEO-SERVICES INC.'S OBJECTIONS
TO SUPPLEMENTAL EVIDENCE DATED APRIL 16, 2015 AND
SUPPLEMENTAL EVIDENCE UNDER 42.64(B)(2)**

¹ Cases IPR2015-00565, IPR2015-00566, IPR2015-00567 have been joined with these proceedings.

Response to Objections to Supplemental Evidence
IPR2014-00687 (Patent No. 7,162,967)
IPR2014-00688 (Patent No. 7,080,607)
IPR2014-00689 (Patent No. 7,293,520)

Pursuant to 37 C.F.R. § 42.64(b)(2), Patent Owner, WesternGeco L.L.C. (“Patent Owner” or “WesternGeco”), hereby responds to Petroleum Geo-Services Inc.’s (“PGS’s”) Objections to Evidence served on April 16, 2015.

In response to PGS’s Objections to Exhibit 2103, the Corrected Declaration of Robin C. Walker, Patent Owner submits as supplemental evidence (1) the document bearing Bates Numbers WG0000001–WG0000022, served Friday, April 24, 2015 (Exhibit 2129); (2) the document bearing Bates Numbers WG0000023–WG0000027 (Exhibit 2130), served Tuesday, April 28, 2015; (3) the spreadsheet titled H12305-0007-075305 (Exhibit 2131), served Tuesday, April 28, 2015; (4) the spreadsheet titled CLIENTEF00502518 – Tims stats 2005 to 2009 Retrieve 1 (Exhibit 2132), served Tuesday, April 28, 2015; and (5) the documents bearing Bates Numbers WG0000028–WG0000032 (Exhibits 2133, 2134, 2135), served Wednesday April 29, 2015.

Patent Owner’s Updated Table of Exhibits for IPR2014-00687, IPR2014-00688, and IPR2014-00689 are being served concurrently with this Response.

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

Respectfully submitted,
Oblon, McClelland, Maier &
Neustadt, LLP

Dated: April 30, 2015

/Michael L. Kiklis/
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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies service of
PATENT OWNER'S RESPONSES TO PETITIONER'S OBJECTIONS TO
SUPPLEMENTAL EVIDENCE DATED APRIL 16, 2015 AND
SUPPLEMENTAL EVIDENCE UNDER 42.64(B)(2) on the counsel of record for
the Petitioner Petroleum Geo-Services, Inc. by delivering a copy via electronic
mail to the following addresses:

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Dated: April 30, 2015

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