

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 IPR2014-00688¹

**PATENT OWNER'S RESPONSE TO
PETROLEUM GEO-SERVICES INC.'S OBJECTIONS
TO SUPPLEMENTAL EVIDENCE DATED JUNE 8, 2015 AND
SUPPLEMENTAL EVIDENCE UNDER 42.64(B)(2)**

¹ Case IPR2015-00567 has been joined with this proceeding.

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 June 8, 2015.

In response to PGS’s Objections to Exhibits 2141-2144, 2146, and 2149-2161, Patent Owner submits as supplemental evidence the Third Declaration of Timothy K. Gilman (Exhibit 2163).

In response to PGS’s Objections to Exhibit 2145, Patent Owner submits as supplemental evidence the Second Declaration of Michael L. Kiklis (Exhibit 2165).

In response to PGS’s Objection to Exhibit 2141 being “improperly reproduced,” Patent Owner submits as supplemental evidence a complete copy of Exhibit 2141.

Exhibits 2163 and 2165 and Patent Owner’s Updated Table of Exhibits for IPR2014-00688 are being served concurrently with this Response.

Response to Objections to Supplemental Evidence
IPR2014-00688

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

Dated: June 22, 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 JUNE 8, 2015 AND SUPPLEMENTAL
EVIDENCE UNDER 42.64(B)(2) on the counsel of record for the Petitioners by
delivering a copy via electronic mail to the following addresses:

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