

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 L.L.C.

Patent Owner.

Case IPR2014-00689¹

U.S. Patent No. 7,293,520

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

¹ Case IPR2015-00565 has been joined with this proceeding.

Pursuant to the Board's December 15, 2014 Scheduling Order (Paper 33) and the parties' Joint Notice of Stipulation to Revised Schedule (Paper 77), Patent Owner WesternGeco L.L.C. respectfully requests oral argument, currently scheduled on July 30, 2015. Patent Owner requests that argument in IPR2014-00689 be consolidated with argument in IPR2014-00687 and IPR2014-00688 and requests three hours to present its arguments: (a) two hours for oral argument for all three proceedings, and (b) one hour of live testimony by Mr. Robin C. Walker. Pursuant to 37 C.F.R. § 42.70, Patent Owner specifies the following issues to be argued:

1. Claims 1 and 18 are not anticipated by Workman;
2. Claims 1, 2, 18, and 19 are not obvious over Workman;
3. Claims 1, 2, 18, and 19 are not anticipated by Hedberg;
4. Claims 1, 2, 18, and 19 are not obvious over Hedberg;
5. Construction of claims 1, 2, 18, and 19;
6. Secondary considerations of non-obviousness;
7. Petitioners' identification of Real Parties in Interest;
8. Whether Petitioners are in privity with each other;
9. Collateral estoppel and res judicata;
10. Whether the petition is time-barred under 35 U.S.C. § 315(b); and

11. Whether Patent Owner has been afforded due process in this proceeding.

Patent Owner also requests that Robin C. Walker be allowed to provide live testimony at the oral hearing on the issue of secondary considerations of non-obviousness.² Mr. Walker submitted a declaration and provided deposition testimony in support of Patent Owner's secondary considerations argument. Petitioners provided no rebuttal evidence on secondary considerations in their reply brief. Instead, Petitioners' sole response to this evidence was to attack Mr. Walker's credibility. Mr. Walker's credibility and testimony are therefore central to this Board's secondary considerations determination. Patent Owner thus respectfully requests that Mr. Walker be allowed to testify. In addition to the two hours that Patent Owner requests for oral argument, Patent Owner requests one hour for Mr. Walker's live witness testimony to be divided equally between Petitioner Petroleum Geo-Services, Inc. ("PGS") and Patent Owner. Specifically,

² Patent Owner and Petitioner Petroleum Geo-Services Inc. ("PGS") have conferred and it is Patent Owner's understanding that PGS will oppose this request.

Patent Owner proposes that it receives 30 minutes for direct examination and that PGS receives 30 minutes for cross examination.³

In the event any fees are required for this Request, please charge Deposit Account No. 15-0030.

Respectfully submitted,

Oblon, McClelland, Maier &
Neustadt, LLP

Dated: June 29, 2015

/Michael L. Kiklis/
Michael L. Kiklis (Reg. No. 38,939)

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³ Patent Owner reserves the right to request additional time for redirect at the oral hearing.

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies service of
PATENT OWNER'S REQUEST FOR ORAL ARGUMENT on the counsel of
record for the Petitioners by filing this document through the Patent Review
Processing System as well as delivering a copy via electronic mail to the following
addresses:

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