

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 IPR2014-00689¹

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

**PETROLEUM GEO-SERVICES INC.'S REQUEST FOR ORAL
ARGUMENT**

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

Pursuant to the Scheduling Order (Paper 34), Stipulation (Paper 76) and 37 C.F.R. § 42.70(a), Petitioner Petroleum Geo-Services Inc. (“PGS”) respectfully requests that the Board hear oral argument in this proceeding on July 30, 2015, *see* Paper 33 at 6, at 9:00 am, *see* July 2015 PTAB Public Hearing Schedule. PGS requests that the Board hold the oral argument in this proceeding (IPR2014-00689) in sequence with any oral argument in the two other related proceedings (IPR2014-00687 and IPR2014-00688). PGS requests twenty minutes of oral argument per side for IPR2014-00689. If the hearings in the three matters are combined, PGS requests one hour of oral argument per side.

Pursuant to 37 C.F.R. § 42.70(a), PGS requests oral argument on all of the instituted grounds of unpatentability of Claims 1, 2, 18, and 19 of U.S. Patent No. 7,293,520.

In its Request for Oral Argument, WG included a page of briefing requesting leave to offer live testimony from Robin Walker. PGS opposes this request. The Board permits live testimony “under very limited circumstances” where, for example, “the demeanor of a witness is critical to assessing patentability.” *K-40 Elecs., LLC v. Escort, Inc.*, IPR2013-00203, Paper 34 at 2 (May 21, 2014). PGS is aware of the Board granting this relief only once, in a case where the credibility of the inventor’s testimony antedating the two prior art references was “key” and potentially “case dispositive.” *Id.* Mr. Walker’s testimony does not come close to

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CERTIFICATE OF SERVICE

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

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