

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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PETROLEUM GEO-SERVICES INC.,  
Petitioner

v.

WESTERNGECO LLC  
Patent Owner

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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)

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**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 2079 is a true and correct copy of a final draft of an industry magazine article entitled "Application of Q-Marine Technology for SPC; Imaging for Pinghu field gas reservoirs" that was produced by employees at WesternGeco and SPC (a customer of WesternGeco) in 2008 and that I received in 2008 and approved in my role as the worldwide Q Product Manager. This article was made and kept in the ordinary course of WesternGeco's business.

4. Exhibit 2080 is a true and correct copy of a customer and marketing presentation entitled "Q-Marine improvements." I produced and gave this presentation during my time at WesternGeco, specifically during the early to mid-2000s. This presentation was made and kept in the ordinary course of WesternGeco's business.

5. Exhibit 2086 is a true and correct copy of a presentation entitled "4D Acquisition with Q-Marine - Experiences and Strategies" that was produced by employees at WesternGeco and that I received during my time at WesternGeco. Specifically, I received this presentation on or around December 1, 2004. This presentation was made and kept in the ordinary course of WesternGeco's business.

6. Exhibit 2088 is a true and correct copy of an article entitled "Mapping the fluid front and pressure buildup using 4D data on Norne Field" from the September 2006 issue of *The Leading Edge*, an industry magazine of the Society of Exploration Geophysicists (SEG). I received this article during my time at WesternGeco and kept it in the ordinary course of WesternGeco's business.

7. Exhibit 2089 is a true and correct copy of an article entitled “Interpreting reservoir talk” from the September 4, 2003 issue of *Offshore Engineer*. I received this article during my time at WesternGeco and kept it in the ordinary course of WesternGeco’s business.

8. Exhibit 2090 is a true and correct copy of an article entitled “Making a good recovery” from the March 14, 2005 issue of *Offshore Engineer*. I received this article during my time at WesternGeco and kept it in the ordinary course of WesternGeco’s business.

9. Exhibit 2091 is a true and correct copy of ION Technical Forum (ITF) 2010’s Book of Abstracts. A version of this document is available for download from ION’s website. See [http://www.iongeo.com/content/documents/pdfs/ITF\\_2010\\_Abstracts\\_.pdf](http://www.iongeo.com/content/documents/pdfs/ITF_2010_Abstracts_.pdf).

10. Exhibit 2092 is a true and correct copy of an article entitled “Intelligent Infill for Cost Effective 3D Seismic Marine Acquisitions” from the 71st EAGE Conference and Exhibition.

11. Exhibit 2093 is a true and correct copy of a draft of an industry magazine article entitled “Evolution Through New Functionality and Applications, Q-Marine gets even better” that was produced by employees at WesternGeco. This article was made and kept in the ordinary course of WesternGeco’s business.

12. Exhibit 2094 is a true and correct copy of an article entitled “Q-Technology - moving into the mainstream” from the July/August 2003 issue of *The Journal of Offshore Technology*. Employees at WesternGeco contributed significantly to the content of this article. I received this article during my time at WesternGeco and kept it in the ordinary course of WesternGeco’s business.

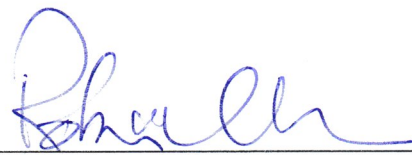
13. Exhibit 2100 is a true and correct copy of an article entitled “WesternGeco, Seeing Below the Surface” from the May 2002 issue of *Shell E&P Technology*.

I received this article during my time at WesternGeco and kept it in the ordinary course of WesternGeco's business.

14. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the results of these proceedings.

15. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: April 9, 2015



Robin C. Walker