

**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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**DECLARATION OF MICHAEL L. KIKLIS**

Pursuant to 28 U.S.C. § 1746, I, Michael L. Kiklis, the undersigned, hereby declare as follows:

1. My name is Michael L. Kiklis. 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 am a partner in the law firm of Oblon, McClelland, Maier & Neustadt L.L.P., counsel for WesternGeco L.L.C. (“WesternGeco”). I am licensed to practice law in the State of Virginia as well as the District of Columbia.

3. Exhibit 2066 in IPR2014-00687 is a true and correct copy of the definition for “global” found in Webster’s Third New International Dictionary, Unabridged.

4. Exhibit 2066 in IPR2014-00688 is a true and correct copy of the definition for “prediction” found in Webster’s Third New International Dictionary, Unabridged.

5. Exhibit 2071 is a true and correct copy of Petitioner’s Responses to Patent Owner’s Interrogatories served in IPR2014-01475 on November 20, 2014.

6. Exhibit 2106 is a true and correct copy of trial testimony of Simon Hastings Bittleston from a Certified Copy of the Trial Transcript in *WesternGeco L.L.C. v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827. This Exhibit contains the same testimony as found in Exhibit 2050.

7. Exhibit 2107 is a true and correct copy trial testimony of Simon Hastings Bittleston from a Certified Copy of the Trial Transcript in *WesternGeco L.L.C.v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827.

8. Exhibit 2108 is a true and correct copy of trial testimony of John Leonard from a Certified Copy of the Trial Transcript in *WesternGeco L.L.C. v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827. This Exhibit contains the same testimony as found in Exhibit 2055.

9. Exhibit 2109 is a true and correct copy of the Declaration of Dr. Brian Evans submitted by the Petitioner in IPR2014-00688.

10. Exhibit 2110 is a true and correct copy of the Declaration of Dr. Jack H. Cole submitted by the Petitioner in IPR2014-00688.

11. Exhibit 2111 is a true and correct copy of the Declaration of Dr. Brian Evans submitted by the Petitioner in IPR2014-00689.

12. Exhibit 2112 is a true and correct copy of *A Handbook for Seismic Data Acquisition in Exploration*, No. 7, Brian J. Evans.

13. Exhibit 2113 is a true and correct copy of trial testimony of Robin Walker from a Certified Copy of the Trial Transcript in *WesternGeco L.L.C. v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827. This Exhibit contains the same testimony as found in Exhibit 2078.

14. Exhibit 2114 is a true and correct copy of excerpts from the Deposition Transcript of Michael Meade Burnham in *WesternGeco L.L.C.v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827.

15. Exhibit 2115 is a true and correct copy of excerpts from the Deposition Transcript of Jeffrey Wayne Cunkelman in *WesternGeco L.L.C.v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827.

16. Exhibit 2116 is a true and correct copy of excerpts from the Deposition Transcript of Hans Ivar Meyer in *WesternGeco L.L.C.v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827.

17. Exhibit 2117 is a true and correct copy of excerpts from the Deposition Transcript of Hans Christian Vaage in *WesternGeco L.L.C.v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827.

18. Exhibit 2118 is a true and correct copy of trial testimony of Glenn Morton from a Certified Copy of the Trial Transcript in *WesternGeco L.L.C.v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827.

19. Exhibit 2119 is a true and correct copy of trial testimony of Raymond Sims from a Certified Copy of the Trial Transcript in *WesternGeco L.L.C. v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827. This Exhibit contains the same testimony as found in Exhibit 2084.

20. Exhibit 2120 is a true and correct copy of trial testimony of Thomas Scoulios from a Certified Copy of the Trial Transcript in *WesternGeco L.L.C. v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827.

21. Exhibit 2121 is a true and correct copy of trial testimony of Robin Walker from a Certified Copy of the Trial Transcript in *WesternGeco L.L.C. v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827.

22. Exhibit 2122 is a true and correct copy of trial testimony of David Moffat from a Certified Copy of the Trial Transcript in *WesternGeco L.L.C. v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827.

23. Exhibit 2123 is a true and correct copy of trial testimony of Charles Ledet from a Certified Copy of the Trial Transcript in *WesternGeco L.L.C. v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827.

24. Exhibit 2124 is a true and correct copy of excerpts from the Deposition Transcript of David Gentle in *WesternGeco L.L.C.v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827.

25. Exhibit 2125 is a true and correct copy of excerpts from the Deposition Transcript of David Moffat in *WesternGeco L.L.C.v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827.

26. Exhibit 2126 a true and correct copy of excerpts from the Deposition Transcript of Svein Dale in *WesternGeco L.L.C.v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827.

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