

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PETROLEUM GEO-SERVICES INC.

Petitioner,

v.

WESTERNGECO L.L.C.

Patent Owner.

Case IPR2014-00689

Patent 7,293,520

**PATENT OWNER WESTERNGECO L.L.C. SUPPLEMENTAL
EVIDENCE IN TO RESPONSE TO PETITIONER'S OBJECTIONS TO
EVIDENCE DATED DECEMBER 30, 2014**

Pursuant to 37 C.F.R. §42.64(b)(2), attached is supplemental evidence in response to the Objections to Evidence dated December 30, 2014 submitted in IPRs 2014-00687, 00688, and 00689. Specifically:

- The attached deposition transcripts of Clement B. Guilliot, III and Charles Joseph Ledet in response to objections to Exhibits 2002 in IPRs 2014-00687, 00688, and 00689.
- The attached declaration of Timothy K. Gilman in response to objections to Exhibits 2008, 2009, 2013, and 2032 in IPRs 2014-00687, 00688, and 00689.
- The attached declaration of Scott A. McKeown in response to objections to Exhibit 2025 in in IPRs 2014-00687, 00688, and 00689.
- The attached trial transcripts that were filed in *WesternGeco L.L.C. v. Ion Geophysical Corporation*, Civil Action No. 4:09-CV-01827 (“the ION litigation”), as downloaded from the Public Access to Court Electronic Records (PACER), in response to the numerous authentication objections to the same in IPRs 2014-00687, 00688, and 00689.

WESTERNGECO L.L.C.
Case IPR2014-00689
U.S. Patent 7,293,520

Respectfully submitted,

Date: January 14, 2015

/Scott A. McKeown/

Scott A. McKeown (Reg. No. 42,866)

Attorney for Patent Owner

WESTERNGECO L.L.C.

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, L.L.P.
1940 Duke Street
Alexandria, Virginia 22314
703-413-3000

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies service of PATENT OWNER WESTERNGECO L.L.C. SUPPLEMENTAL EVIDENCE IN TO RESPONSE TO PETITIONER'S OBJECTIONS TO EVIDENCE DATED DECEMBER 30, 2014 on the counsel of record for the Petitioner via electronic mail to the following address:

David Berl
Williams & Connolly, LLP
725 Twelfth St. N.W.
Washington, DC 20005
DBerl@wc.com

Christopher Suarez
Williams & Connolly, LLP
725 Twelfth St. N.W.
Washington, DC 20005
Csuarez@wc.com

Respectfully submitted,

Date: January 14, 2015

/Scott A. McKeown/
Scott A. McKeown (Reg. No. 42,866)
Attorney for Patent Owner
WESTERNGECO L.L.C.