

IN THE 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 No. IPR2014-00689¹
U.S. Patent No. 7,293,520

**PETITIONER PETROLEUM GEO-SERVICES INC.'S REPLY IN
SUPPORT OF MOTION TO EXCLUDE**

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

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I. WG's General Grievances About the Motion Are Misplaced.

Revealingly, WG's Opposition does not attempt to defend the admissibility of most of the contested exhibits. Rather, WG spends six pages grumbling about the form of PGS's motion. PGS's motion complies with 37 C.F.R. § 42.64(c). Each section identifies by number the exhibits subject to the particular objection, where WG relied on those exhibits, and the grounds for exclusion. And PGS referred the Board to its earlier-served objections, which addressed the exhibits in numerical order. Paper 85 ("Mot.") at 2; *see also* Exs. 1116-18. The first page of the motion included a table (single-spaced per 37 C.F.R. § 42.6(a)(2)(iii)), listing the objectionable exhibits in order, the basis for the objection, and where it is addressed in detail. Having inundated the record with evidence so clearly inadmissible that WG does not even attempt to defend it, WG cannot properly blame PGS for the numerosity of its objections. *See* Paper 90 ("Opp.") at 1.

WG wrongly complains that PGS "completely ignores [WG's] supplemental evidence." Opp. at 3. Not so. PGS considered WG's supplemental evidence and withdrew some of its original objections. *Compare* Mot. with Exs. 1116-18. But, as PGS expressly stated, *see* Mot. at 6-7, 10-11, WG's efforts to cure others through supplemental evidence were insufficient. *See also* § V, *infra*.

II. The Walker Statement Does Not Comply with the Law.

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