

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 IPR2014-01477

U.S. Patent No. 7,080,607

PATENT OWNER'S LIST OF PROPOSED MOTIONS

Pursuant to Patent Trial and Appeal Board instituting trial on March 17, 2015, and in advance of the initial conference call scheduled for April 13, 2015, Patent Owner WesternGeco, L.L.C. ("WesternGeco") hereby identifies the proposed motion it presently intends to file in the above-captioned *inter partes* review proceeding.

Proposed Motion

1. Motion for Additional Discovery Under 37 C.F.R. § 42.51(b)(2)

If the parties are unable to reach agreement on additional discovery regarding Petitioner's real-party-in-interest representation, WesternGeco may file a motion seeking additional discovery on this issue.

Respectfully submitted,

Oblon, McClelland, Maier &
Neustadt, LLP

Dated: April 9, 2015

/Michael L. Kiklis/
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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies service of
PATENT OWNER'S LIST OF PROPOSED MOTIONS on the counsel of record
for the Petitioner by filing this document through the Patent Review Processing
System as well as delivering a copy via electronic mail to the following address:

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