

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PETROLEUM GEO-SERVICES INC.
Petitioner

v.

WESTERNGECO, LLC
Patent Owner

Case IPR2014-01477

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

**PETROLEUM GEO-SERVICES INC.'S LIST OF
ANTICIPATED PROPOSED MOTIONS**

Pursuant to the Trial Practice Guide, 77 Fed. Reg. 48,756, 48,765-66 (Aug. 14, 2012), in advance of the initial conference call with the Board scheduled for Monday, April 13, at 1:00 p.m. EST, Petitioner Petroleum Geo-Services Inc. (“PGS”) submits the following list of motions that PGS is considering filing in this matter. The list includes motions that are anticipated as of the date of this filing. PGS may seek Board authorization to file additional motions in the future, and this list is not meant to be an exhaustive list of PGS’s potential motions.

A. Motion to Exclude Evidence Under 37 C.F.R. § 42.64(c)

PGS may file a motion to exclude any exhibit to which it serves objections to pursuant to 37 C.F.R. § 42.64(b)(1), which PGS may do within five business days of receipt of Patent Owner’s Response to the Petition. The bases for any such motion would be as set forth in objections served pursuant to 37 C.F.R. § 42.64(b)(1) and expanded upon in the motion to exclude.

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

If PGS needs additional discovery and the parties are unable to reach an agreement regarding such additional discovery, PGS may file a motion for additional discovery, including in relation to any arguments relating to objective indicia advanced by patent owner.

Dated: April 9, 2015

Respectfully submitted,

/David I. Berl/

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above-captioned *Petroleum Geoservices Inc.'s List of Anticipated Proposed Motions* was served on April 9, 2015, by delivering a copy via electronic mail upon the following attorneys of record for the Petitioner:

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