# Ex. PGS 1003

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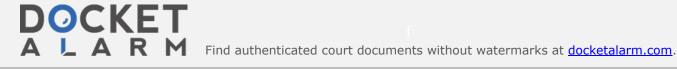
BEFORE THE PATENT TRIAL AND APPEAL BOARD

PETROLEUM GEO-SERVICES INC. Petitioner v.

> WESTERNGECO LLC Patent Owner

CASE IPR: <u>Unassigned</u> Patent 7,080,607 B2

DECLARATION OF DR. JACK H. COLE, PhD.



## **TABLE OF CONTENTS**

I.	INTE	RODUCTION	1
II.	QUA	LIFICATIONS	1
III.	COM	IPENSATION AND RELATIONSHIP TO THE PARTIES	8
IV.	LEGAL STANDARDS		
	A.	Claim Construction	9
	B.	Person of Ordinary Skill in the Art	9
V.	SUM	IMARY OF OPINION	10
VI.	TEC	HNICAL BACKGROUND	11
	A.	Overview of Marine Seismic Surveying	11
	B.	Streamer Steering Overview	14
	C.	Control Systems Overview	15
VII.	THE	PATENT AT ISSUE	18
	A.	The Specification of the '607 Patent	18
	B.	The Time Frame of the '607 Patent	21
	C.	Claims 15-23 of the '607 Patent	22
	D.	Relevant Claim Terms and Their Construction	24
		1. "Control unit"	25
		2. "Global control system"	25
		3. "Local control system"	26
VIII.	THE	ABILITY TO IMPLEMENT CONTROL SYSTEMS	27
	A.	Control Systems for Use in Marine Seismic Surveys Were Disclosed in the 1960s	27

	B.	Global and Local Control Systems Became More Automated in the 1970s and 1980s with Advances in Computer Control Systems	30
	C.	Global and Local Control Systems Continued to Progress in the 1980s and 1990s	35
	D.	State of Control Systems Art at the Priority Date	50
IX.	CON	ICLUSION	55

I, Dr. Jack Cole, hereby state the following:

#### I. INTRODUCTION

 Petroleum Geo-Services, Inc. ("PGS") has retained me to provide consulting services related to the filing of a Petition for *Inter Partes Review* of U.S. Patent No. 7.080,607 B2 ("the '607 Patent") (Ex. 1001). All opinions presented in this report are my own.

2. PGS has asked me to provide an opinion as to whether or not a person of ordinary skill in the art ("POSA") would have been able, by the applicable priority date, to implement certain claims of the '607 Patent relating to control systems. This report describes my opinions and the reasons for them. In reaching my opinion, I have relied on my extensive expertise in the control systems field and the materials listed in Appendix A.

3. I have reached the opinions in this report on the basis of the materials and information currently available to me. I reserve the right to modify my opinions, including to supplement my opinions in light of information that becomes available to me. I also reserve the right to continue my investigation and analysis, including concerning materials that have not yet been produced.

#### II. QUALIFICATIONS

4. I am a Design and Controls Engineer. I am currently the President of my own independent research company and a member of the graduate faculty at

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