

# Ex. PGS 1003

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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PETROLEUM GEO-SERVICES INC.

Petitioner

v.

WESTERNGECO LLC

Patent Owner

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CASE IPR: Unassigned

Patent 7,080,607 B2

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**DECLARATION OF DR. JACK H. COLE, PhD.**

## TABLE OF CONTENTS

I.	INTRODUCTION .....	1
II.	QUALIFICATIONS .....	1
III.	COMPENSATION AND RELATIONSHIP TO THE PARTIES .....	8
IV.	LEGAL STANDARDS .....	8
	A. Claim Construction .....	9
	B. Person of Ordinary Skill in the Art .....	9
V.	SUMMARY OF OPINION .....	10
VI.	TECHNICAL 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.	CONCLUSION.....	55

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

## **I. INTRODUCTION**

1. 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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