

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 IPR2014-01477<sup>1</sup>

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

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**PETITIONER PETROLEUM GEO-SERVICES INC.'S**  
**MOTION TO EXCLUDE**

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<sup>1</sup> Case IPR2014-00688 is a related proceeding.

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Pursuant to 37 C.F.R. § 42.64(c), Petitioner Petroleum Geo-Services Inc. (“PGS”) moves to exclude exhibits offered and relied on by Patent Owner WesternGeco, LLC (“WG”). The following table identifies the exhibits PGS moves to exclude, which are discussed in detail below.

Ex.	Section Addressed (Bases for Exclusion)	Ex.	Section Addressed (Bases for Exclusion)
2053	II.C (H, R)	2108	II.C (H)
2059	II.B (H)	2109	II.C (H)
2060	II.C (A, H)	2115	II.C (H)
2061	II.C (A, H)	2116	II.C (H)
2063	II.C (H)	2117	II.C (H)
2067	II.C (A, H)	2118	II.C (A, H)
2083	II.B (H)	2119	I.B, II.C (H)
2085	II.B (H)	2120	II.C (H)
2087	II.B (H)	2121	II.A (H, R)
2096	II.C (H)	2123	II.C (H)
2097	II.C (H)	2124	II.B (H)
2099	I, I.A, I.B, I.C, (H, R, F, P)	2125	II.B (H)
2101	II.C (H)	2127	II.C (H)
2102	II.C (H)	2128	II.C (H)
2103	II.C (H)	2129	II.C (H)
2104	I.B, II.C (H)	2130	II.C (H)
2105	I.B, II.C (H)	2131	II.C (H)
2106	I.B, II.B (H)	2132	II.C (H)
2107	II.C (A, H)	2140	II.B (H)

**Key: A – Authentication; H – Hearsay; F – Lacks Foundation; R- Relevance; P – Lacks Personal Knowledge**

PGS timely objected to each of these exhibits, on the grounds identified above, on Aug. 14, 2015. *See* IPR2014-01475 (“-01475”), Paper 42 at 2-11, 13,

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