

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 L.L.C.

Patent Owner.

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Case IPR2014-01477

Patent 7,080,607

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**PATENT OWNER WESTERNGECO L.L.C.'S  
RESPONSES TO PETITIONER'S OBJECTIONS TO EVIDENCE DATED  
AUGUST 14, 2015 AND SUPPLEMENTAL EVIDENCE**

Responses to Objections to Evidence and Supplemental Evidence

In response to Petitioner's August 14, 2015 Objections to Evidence, Patent Owner WesternGeco L.L.C. ("WesternGeco" or "Patent Owner") hereby responds, on an exhibit-by-exhibit basis, as follows:

**Exhibit 2053:** Patent Owner provides the Second Declaration of Timothy K. Gilman.<sup>1</sup>

**Exhibit 2075:** Patent Owner submits that Dr. Triantafyllou, the Director of the Center for Ocean Engineering at MIT, has over 35 years of experience researching cable mechanics, the hydrodynamics of marine cables, and the control of marine systems. Dr. Triantafyllou has spent decades studying, researching and teaching about the mechanics of cables through the water, which includes streamers and towed arrays, and published over a dozen papers on this topic. *See, e.g.,* Exhibit 2075, ¶¶ 1-11; Appendix A. Additionally, Dr. Triantafyllou has published multiple papers on the control of marine systems and Kalman filtering techniques. *Id.*

**Exhibit 2098:** Patent Owner provides the Second Declaration of Timothy K. Gilman.

**Exhibit 2103:** Patent Owner provides Exhibits 2149 and 2150.

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<sup>1</sup> The Second Declaration of Timothy K. Gilman is Exhibit 2148 to this proceeding.

Responses to Objections to Evidence and Supplemental Evidence

**Exhibit 2104:** Patent Owner provides Exhibit 2151.

**Exhibit 2105:** Patent Owner provides Exhibits 2152 and 2153.

**Exhibit 2107:** Patent Owner provides the Second Declaration of Timothy

K. Gilman.

**Exhibit 2109:** Patent Owner provides Exhibit 2154.

**Exhibit 2116:** Patent Owner provides Exhibit 2155.

**Exhibit 2117:** Patent Owner provides the Second Declaration of Timothy

K. Gilman and Exhibits 2150, 2156, 2157, 2158, and 2159.

**Exhibit 2119:** Patent Owner provides Exhibit 2160.

**Exhibit 2120:** Patent Owner provides Exhibit 2155.

Respectfully submitted,

Oblon, McClelland, Maier &  
Neustadt, LLP

Dated: August 28, 2015

/Michael L. Kiklis/

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WESTERNGECO L.L.C.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above-captioned Responses to Objections to Evidence and Supplemental Evidence were served by delivering copies via electronic means upon the following attorneys of record for Petitioner:

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