UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PETROLEUM GEO-SERVICES INC.,

Petitioner,

v.

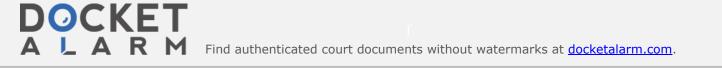
WESTERNGECO L.L.C.,

Patent Owner.

Case IPR2014-01478

U.S. Patent No. 7,293,520

PATENT OWNER'S LIST OF PROPOSED MOTIONS



Pursuant to Patent Trial and Appeal Board instituting trial on March 17, 2015, and in advance of the initial conference call scheduled for April 13, 2015, Patent Owner WesternGeco, L.L.C. ("WesternGeco") hereby identifies the proposed motion it presently intends to file in the above-captioned *inter partes* review proceeding.

Proposed Motion

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

If the parties are unable to reach agreement on additional discovery regarding Petitioner's real-party-in-interest representation, WesternGeco may file a motion seeking additional discovery on this issue.

Respectfully submitted,

Oblon, McClelland, Maier & Neustadt, LLP

Dated: April 9, 2015

/Michael L. Kiklis/ Michael L. Kiklis (Reg. No. 38,939) Attorney for Patent Owner WESTERNGECO L.L.C.

Customer Number 22850 Tel. (703) 413-3000 Fax. (703) 413-2220 (OMMN 02/10) Patent Owner's List of Proposed Motions Case IPR2014-01478 U.S. Patent No. 7,293,520

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies service of

PATENT OWNER'S LIST OF PROPOSED MOTIONS on the counsel of record

for the Petitioner by filing this document through the Patent Review Processing

System as well as delivering a copy via electronic mail to the following address:

David Berl Christopher Suarez Williams & Connolly, LLP 725 Twelfth Street, N.W. Washington, D.C. 20005 <u>dberl@wc.com</u> <u>csuarez@wc.com</u>

Dated: April 9, 2015

/Michael L. Kiklis/ Michael L. Kiklis (Reg. No. 38,939) Attorney for Patent Owner WESTERNGECO L.L.C.