

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 REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's March 17, 2015 Scheduling Order (Paper 19) and the parties' Joint Notice of Stipulation Concerning Scheduling and Discovery (Paper 30), Patent Owner WesternGeco L.L.C. respectfully requests oral argument, currently scheduled on November 12, 2015. Patent Owner requests that argument in IPR2014-01478 be consolidated with argument in IPR2014-01475 and IPR2014-01477 and requests that each party receives two hours to present its arguments, with the two hours to be allocated amongst the three cases as each party sees fit. Pursuant to 37 C.F.R. § 42.70, Patent Owner specifies the following issues to be argued:

1. Claims 3, 5, 20, and 22 are not rendered obvious by Workman;
2. Claims 13, 14, 30, and 31 are not anticipated by Workman;
3. Claims 13, 14, 30, and 31 are not rendered obvious by Workman;
4. Claims 15-17 and 32-34 are not rendered obvious by Workman and Dolengowski;
5. Construction of claims 1, 3, 5, 13-18, 20, 22, and 30-34;
6. Secondary considerations of non-obviousness;
7. Petitioner's identification of Real Parties in Interest;
8. Whether Petitioner is in privity with Ion Geophysical Corporation and ION International S.A.R.L.;

Patent Owner's Request for Oral Argument
Case IPR2014-01478
U.S. Patent No. 7,293,520

9. Whether the petition is time-barred under 35 U.S.C. § 315(b); and

10. Whether Patent Owner has been afforded due process in this proceeding.

In the event any fees are required for this Request, please charge Deposit

Account No. 15-0030.

Respectfully submitted,

Oblon, McClelland, Maier &
Neustadt, LLP

Dated: October 14, 2015

/Michael L. Kiklis/
Michael L. Kiklis (Reg. No. 38,939)

Customer Number

22850

Tel. (703) 413-3000

Fax. (703) 413-2220

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies service of
PATENT OWNER'S REQUEST FOR ORAL ARGUMENT 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
addresses:

David Berl
dberl@wc.com

Jessamyn Berniker
jberniker@wc.com

Thomas S. Fletcher
tfletcher@wc.com

Christopher Suarez
csuarez@wc.com

Dated: October 14, 2015

/Michael L. Kiklis/
Michael L. Kiklis (Reg. No. 38,939)