

LOCASCIO Continued Direct of THOMAS SCOULIOS

07:48 1 A That's correct.
 2 Q And you can't see the boat?
 3 A That's correct.
 4 Q So now you are trying to grab a streamer?
 07:48 5 A Yeah. Well, one person would be driving and the other two
 6 folks will grab -- they'll literally -- it has gotten a lot
 7 better, we now have mechanical devices. But at the time we
 8 would get our arms around it and you would want to get it so
 9 you could attach and detach pieces. You don't want to tie it
 07:48 10 to your boat because if something goes wrong, it will flip your
 11 boat, and you want to stay in your boat.
 12 And so we would work on it and manage it and
 13 manhandle it. And we would sometimes have a spare section on
 14 the boat, and we would try to hook it up and swap it out. It
 07:48 15 was a lot of work.
 16 Q Are there people that don't want to get this job?
 17 A The small boat you have to volunteer to do. You can't
 18 force anyone to do this. But if it is your department and it
 19 is your equipment and you don't volunteer and no one else does,
 07:49 20 then you learn to like it.
 21 Q And what happens if you can't fix the tangle when you are
 22 back there in the boat?
 23 A If you can't fix the tangle by boat, because boat is always
 24 the best option because you don't have to pull everything back
 07:49 25 onboard the ship, you then use these large hydraulic winches to

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07:49 1 slowly pull all the equipment back onboard the boat and repair
 2 it.
 3 Q Couldn't you just cut the cable loose?
 4 A No. We are a zero discharge company. We don't disturb --
 07:49 5 we don't cut anything. The only time you are ever allowed to
 6 dump something over the side of the boat is if somebody's life
 7 is in immediate danger. Otherwise, you take the time to
 8 retrieve it. And if somebody's life is in danger and you cut
 9 something, the first thing you do after you secure that person
 07:49 10 is you go get whatever you put over the side of the boat.
 11 Q How long were you in this role where you were at the back
 12 of the boat responsible for the streamers and the array?
 13 A I was offshore my first two years, but I did doubles, so I
 14 ended up working about ten months each year offshore, and then
 07:50 15 I moved on to a different role.
 16 Q And what was your next job?
 17 A I was what was called an assistant party chief, assistant
 18 party manager. So I became the shore-based logistical manager
 19 for a group of vessels in the Gulf of Mexico. I was brought
 07:50 20 off the boats to manage some of the crews in Houston.
 21 Q In those roles, did you interact with customers?
 22 A I did.
 23 Q In what manner?
 24 A Well, every day you talk to the customer -- in that role,
 07:50 25 you are managing all the logistics for the boat, you are

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07:50 1 managing the crew, you're managing the equipment. You are
 2 basically the representative on the beach for the boat, so you
 3 are their conduit to everything. You do all the ordering.
 4 When the client orders something, you talk to them. The time
 07:50 5 lines, delivery schedule, where the boat is, when it is going
 6 to be there.
 7 Q In that work, did you learn what was valuable to other U.S.
 8 companies?
 9 A Certainly.
 07:51 10 Q What was that?
 11 A Well, they want everything better, they want everything
 12 faster and they want everything safer.
 13 Q Do they care about value?
 14 A They do.
 07:51 15 Q And how do they measure that?
 16 A Value is normally measured in time. It is also measured in
 17 the quality of what you are doing, which is a function of time
 18 quite often.
 19 Q Let's talk a bit about the inventions in this case, sir.
 07:51 20 When did you first hear about a system that could steer
 21 streamers laterally?
 22 A I mentioned I worked for a company called Western
 23 Geophysical, and we did not have this. We wanted it but we
 24 didn't have it. It didn't exist, to my knowledge.

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07:51 1 Geco, and they had it. And when we became a joint company, we
 2 were very, very pleased. The first time I got to see it was in
 3 2000.
 4 Q Prior to Western and Geco coming together, which side were
 07:52 5 you on? The Western side?
 6 A I was on the Western side.
 7 Q And did Western have a lateral steering system?
 8 A We did not.
 9 Q Was that something you wanted for a long time?
 07:52 10 A Oh, certainly.
 11 Q Why?
 12 A Through all the problems I mentioned earlier, to keep these
 13 cables from separating, all we had was -- we had two other
 14 options. We had -- we attempted to put -- steer our tail
 07:52 15 buoys, but none of those ever worked. We ended up either
 16 breaking the tail buoy off or floating them.
 17 The other thing we had was something called
 18 cross-tagging, which was basically a rope between the cables,
 19 which turns your seismic array into a bit of a trawler net,
 07:52 20 so...
 21 Q When you mentioned a second ago that you had these two
 22 options, the rope and this steerable tail buoy, what was that?
 23 A It was at the back of this cable, you have a float, and the
 24 float has a radar detector and a GPS antenna or something so

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07:52 1 control to try and drive this tail buoy around.
 2 Q Okay. Was there anything else between the end of the
 3 streamer and the ship that was attempting to steer it?
 4 A Not laterally, no.
 07:53 5 Q And did this tail buoy work to steer the streamer?
 6 A No. They broke off. The most you could do was to try to
 7 get a tail buoy to work a little bit, but even then -- I never
 8 saw one successfully work in the field.
 9 Q Had Western tried to solve this lateral steering problem
 07:53 10 and failed?
 11 A We had wanted to try, but we had never been successful at
 12 anything.
 13 *THE COURT:* The lateral steering mechanism you were
 14 using, was that patented?
 07:53 15 *THE WITNESS:* I don't know. It was on the tail buoy,
 16 but it was very different than an inline streaming device.
 17 BY MR. LOCASCIO:
 18 Q Let me talk for a second about this Western and Geco
 19 combination or merger. What did Geco Limited do?
 07:54 20 A Geco had a different acquisition system than we did, which
 21 was called a Q, and it had lateral steering.
 22 Q And what did Western bring to the table?
 23 A Western brought a lot of people, a lots of boats, a lot of
 24 experience, so it was a pretty good merger of people and
 07:54 25 technology. We weren't looking forward to the merger

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07:54 1 beforehand, but once we saw what they had, some of us were
 2 happy.
 3 Q Were you happy?
 4 A I was happy. I am happy.
 07:54 5 Q What is it about the merger that you thought was a good
 6 thing for the company?
 7 A Well, they had a much, much better acquisition system than
 8 we did, and they had the ability to steer the streamers. They
 9 had technology that was far and above better than ours.
 07:54 10 Q What time period was this?
 11 A This was 2000.
 12 Q And did you see the Geco steering system after the merger
 13 took place?
 14 A I did.
 15 Q What did you see?
 16 A I was an operations manager at this point, so I was
 17 still -- I was part of the field crew, managing field crews.
 18 And so I spent a lot of time on the boat, still going out and
 19 at the docks. And I got to see one of the vessels where we
 07:55 20 tested WesternGeco's two cables and Geco's two cables alongside
 21 each other.
 22 Q So Western and Geco sort of had a showdown?
 23 A They put all four cables on the back of the vessel. I
 24 wasn't part of the test group itself, but it was all logistics
 07:55 25 team down there helping get it down there to the boat.

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07:55 1 Q How did the demo go?
 2 A The Geco equipment won.
 3 Q You said it made you happy that you were now going to have
 4 this technology. Why, from an industry standpoint?
 07:55 5 A Well, it was a competitive advantage. If you can steer the
 6 cable, you can shoot your surveys safer, you can shoot them
 7 faster, you can position them better. It is -- I think it's
 8 one of the most incredible developments in the field I have
 9 ever seen.
 07:55 10 Q Prior to Geco's development of this technology, was this a
 11 problem people were trying to solve?
 12 A Certainly.
 13 Q Was this the first time you had seen it solved?
 14 A I had never seen it solved. I had never seen anything even
 07:56 15 approach this that worked. It wasn't just one bird. It was a
 16 system that moved in tandem. You could move all these cables
 17 around. You could actually control this thing for the first
 18 time.
 19 Q Q-Marine, which is the name the Geco system had, has that
 07:56 20 been successful?
 21 A It's been very successful.
 22 Q Why, do you think?
 23 A Well, we started out with one Q-Marine crew and we are
 24 still rolling out. We're eventually converting the entire

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07:56 1 are. The goal is to replace every single vessel we have with
 2 this stuff because we get a premium for it when we work. It is
 3 demanded by the customers, and it has been very successful.
 4 Q You indicated that the customers want the surveys to be
 5 faster, better and safer. Can we take those one by one with
 6 connection to lateral steering?
 7 A Sure.
 8 Q How does lateral steering allow you to conduct a survey
 9 faster?
 07:57 10 A Right off the bat, having streamer control is -- it's
 11 important for something we called "infill" earlier when we were
 12 referencing it. And this is when you are shooting prime or
 13 you're shooting infill, and infill is the bits of unmowed lawn.
 14 I made a board. I can show you if you like.
 15 *The simplest analogy is the lawnmower analogy,*
 16 *and you are trying to mow a yard, and you're trying to mow the*
 17 *data. This is my boat and this is my yard, and you do your*
 18 *pass moving upwards. You now have one pass where you have*
 19 *essentially cleaned that data.*
 07:57 20 Q How long does it take for the ship to make that pass
 21 typically?
 22 A It can be -- the length of a line is dependent -- in the
 23 Gulf of Mexico, the average lines that we have been shooting
 24 have been ten to 12 hours.

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07:57 1 A Just to go one pass up.
 2 Q And what happens then?
 3 A We then want to turn around. It is something called a
 4 "line change." So we then take the boat. Now, if you just
 07:58 5 pivot, you have to remember you have cables which might be the
 6 length of the survey, so the boat has to go all the way up
 7 here.
 8 Now, in order to turn around, you can do one of
 9 two things. If you want to take the line directly beside you,
 07:58 10 you have to do a big, giant turn, like you have a trailer on
 11 your car. That adds a couple hours to your turn. It is not
 12 efficient.
 13 So you do something called a "racetrack." You
 14 come up, and then you come down in another location over here.
 07:58 15 As you go down, you do your second pass, and so now you have
 16 two clean lines in your yard and you have a bunch of grass
 17 still to mow. Sorry for the analogy, but it was the one first
 18 used to me when I went offshore, and it makes sense.
 19 You then come back around, and you want to line
 07:58 20 up. This has now been ten to 12 hours. It could be longer, it
 21 could be shorter. I'm not arguing that. And then you have
 22 added three to six hours for each of these line changes, so it
 23 might be a day or two later when you are coming back on the
 24 second line. The weather could have changed, the currents
 07:59 25 could have changed. And you come on, and you are trying to

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07:59 1 match this vessel alongside again. You start out with the best
 2 of intentions on your line, but as the currents come, you might
 3 leave a pass of infill. And as you go up, you then have an
 4 element of basically unmowed yard.
 07:59 5 As the survey continues, you are trying really
 6 hard. We were trying really hard. We spent a lot of time
 7 watching those cables and moving the boat around. You end up
 8 with chunks of unknown grass. That's the infill that you have
 9 to come back.
 07:59 10 Q How is it that you would come back to get it?
 11 A You do it one of two ways. You either clean it up as you
 12 go, which is very rare, because every job has a budget and you
 13 have so much money you can spend, or you come back at the end
 14 of the job and you pick up these passes.
 07:59 15 Q To clean up one of those strips of grass or pieces of
 16 infill, how much additional time does that take?
 17 A If the pass is not located directly in line with another
 18 pass, so you have to do a whole line for it, it is like
 19 shooting an entire line over again. So you might spent 18,
 08:00 20 20 hours to go back and get that one piece of grass.
 21 Q Are there ever obstructions in the field?
 22 A Okay. So this is another yard example. If you have trees
 23 in your yard, if you have toys in the yard when you are mowing,
 24 it's the same as if you have oil platforms or ships. The oil
 08:00 25 platforms you can plan on. The ships, if they are responding,

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08:00 1 you can try to plan on. But you have to remember, if you have
 2 this vessel that's towing 6 miles of cable, if they see a ship
 3 and even if they answer, if they don't get out of the way fast
 4 enough, the only thing you can do is turn very, very slowly.
 08:00 5 It's a slow-motion nightmare when things don't go very right.
 6 So if you have this tree in the middle, you have
 7 to come in and get the tree and you have to go around it. If
 8 you come in like this and try and go around the tree, you will
 9 get it on one side. If you then come back the other direction,
 08:01 10 you leave a large hole around that tree, so that creates even
 11 more infill.
 12 Q How does the lateral steering system allow you to improve
 13 on this?
 14 A So lateral steering, if you are actively controlling where
 08:01 15 your lawnmower is going, it gives you the chance so that if you
 16 are moving here and you see the current starts to push your
 17 cable over, when you are getting this line the first time, you
 18 can swing them over and attempt to catch that.
 19 In addition, when you're going around
 08:01 20 obstructions, you can get closer, which is important because
 21 the oil rig is normally the most important part of the survey.
 22 The oil is underneath that thing, so you want to get as close
 23 as possible. But you want to do it safely, you don't want to
 24 hit it.

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08:01 1 vessel coming across, a ship or otherwise, you can react in a
 2 safer, more controlled manner than just driving in a big loop
 3 and coming back and doing it again.
 4 Q Thank you, sir.
 08:02 5 A Sorry. I'm not an artist.
 6 Q Can you explain to the jury what repeatability is in
 7 surveys?
 8 A I have some examples of a 4D survey. But repeatability is,
 9 once a company found its reservoir, they want to try and
 10 produce it efficiently. Oil fields are not like a triangle
 11 with a spigot on the top. The best shape I have ever seen is
 12 more like a potato, a very misshapen potato.
 13 They want to produce this. So with
 14 repeatability, they want to go back and take multiple pictures
 08:02 15 of this reservoir through the life of production.
 16 Q You mentioned you might have a slide that might help
 17 explain this to the jury.
 18 A Yes. This one is built learning. If you go to Slide 7 and
 19 you show the reservoir.
 08:02 20 MR. LOCASCIO: Let's get that on the screen.
 21 THE WITNESS: So this is your reservoir. They have
 22 decided to start producing it. In this function of production,
 23 they are going to do many things to this reservoir. They're
 24 going to put a hole in the top.

08:03 1 to do many different things to get the oil and gas out. They
2 may inject air into the reservoir. They may inject water into
3 the reservoir, and the reservoir wall is going to change.

4 So if you go to the next image, this is Slide A.
08:03 5 So in '09, you have the first image. You do what's called a
6 baseline survey. So you get your very first picture. And this
7 is a snapshot of what the reservoir looks like. You come back
8 later in '12, you shoot another picture, and you want to
9 compare the difference in those. So after you have the two
08:03 10 surveys, you start to see how the oil and gas is moving around
11 the reservoir.

12 Now, mentioning a camera, this very much equates
13 to setting up a camera in front of an object and trying to spot
14 the difference in one specific item. If you take that picture
08:03 15 over and over, you can see what has changed when you look at
16 these pictures side by side. If you start moving the camera
17 around, you lose -- you start -- it gets much more difficult to
18 find out what is actually changing in that reservoir. The
19 reason this is important is to efficiently extract that,
08:04 20 because you want to get as much oil and gas out of that as you
21 can onshore, into your production facility.

22 Q And how does lateral steering of the system that does it
23 allow you to get a better 4D image?

24 A So lateral steering helps in actually multiple ways in a 4D
08:04 25 survey. First and foremost, when you shoot that baseline

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08:04 1 survey, you know where your cables are, so you know where your
2 camera is. If you can steer your cables and you are not
3 dependent on the currents, you can accurately put that camera
4 back in the right place. You can put those cables almost in
5 the exact same heading, weather-dependent, or as close as
6 possible to. So you start to remove -- you start to remove
7 elements that are not part of your original -- your 4D image.
8 You start to remove the noise.

9 In addition, a 4D production means that's
08:05 10 somebody found oil and gas there, so they've gone and put a rig
11 right on top of where you are trying to be looking. So they
12 put a tree on top of your -- in the middle of your yard. So by
13 adding a service stream, it allows you to effectively get
14 around those obstructions. So it makes your 4D surveys much
15 more efficient.

16 Q Didn't people do 3D and 4D surveys before this technology
17 existed?

18 A We did. But they have gotten much, much better since we
19 have been able to steer streamers laterally.

20 Q Has that difference been valuable to customers?

21 A It has been very valuable to customers.

22 THE COURT: Who would read the end product? Would it
23 be somebody with WesternGeco or would it be a client,
24 geologist?

08:05 25 THE WITNESS: Geologist in the oil company -- well, we

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08:05 1 would all try to take an image of it, but the oil companies
2 would consider their final interpretation as their property, so
3 that is going to be the property of the oil company.

4 THE COURT: So is it a little bit like a radiologist
08:06 5 taking an image and showing it to a surgeon?

6 THE WITNESS: Yes. And three surgeons are going to
7 have different opinions on where to cut but...

8 THE COURT: Yeah.

9 BY MR. LOCASCIO:

08:06 10 Q Going back to the benefits of Q-Marine, how does Q-Marine
11 make surveys safer?

12 A Well, by being able to control these streamers, you can
13 reduce -- number one, you can reduce your likelihood of hitting
14 something. You don't ever want to do that. You can reduce the
08:06 15 instances of tangles, and the fewer tangles you have, the less
16 people you are putting in the back of the vessels.

17 Q Do streamers still get tangled, or is this the 100 percent
18 solution?

19 A The streamers still get tangled, that's true. But let's
08:06 20 say, for example, you had ten cables out and you hit a tree --

21 Q I assume that's a floating tree?

22 A A floating tree. We had a telephone pole come in one of
23 our lanes Christmas Day, I remember.

24 So this thing starts to go crazy on the right.

08:07 1 outside cable is going to break off and it's going to start to
2 fall backwards. If your cables are all drifting to the right
3 and your right side cable breaks, it is going to catch it and
4 then you could have a domino effect. I have been on a job
08:07 5 where I have seen all ten cables get ripped off one by one.
6 100 kilometers of cable ended up getting ripped off the back of
7 the boat, which is a nightmare.

8 If you can steer your streamers and you start to
9 have an incident on the outside cable, you quickly get the
10 other nine and get out of the way, and you have one break off
11 and you send one back and hopefully you can pick it up.
12 Because it hasn't touched any of the others, it is much easier
13 to fix and repair, and you can get it going hopefully in less
14 than a day. That is the goal anyway.

08:07 15 Q You mentioned earlier shooting around a rig and shooting
16 around other obstructions. Can you give the jury a
17 particularly complicated example of doing that?

18 A I can. I have got some examples for this. The most
19 complicated example of steerable streamer I have ever seen was
20 actually in the Gulf of Mexico. This was a very, very bad
21 incident. I think everybody is familiar with BP when they had
22 the Macondo oil spill. We were not involved before, but we
23 were asked to help in fixing it.

24 So this survey was called the Moses survey. It

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08:08 1 and they had something like 100 vessels out there trying to fix
2 this oil spill. This is while the oil spill was actually
3 happening, not before.

4 They gave us this map and they said: This red
08:08 5 line we would like you to shoot and two more red lines that
6 were in different azimuths as well.

7 How this came to be is, Secretary Chu, who is the
8 secretary of energy for the United States, with BP, evaluated
9 our technology. They called us directly on the phone, and they
08:08 10 said: Can you guys go in there and can you thread the needle?
11 Can you put your cable three times a day over the top of the
12 wellhead?

13 Now, this was after the spill. You guys are
14 saying: Well, why would you guys go in after the spill? We
08:09 15 know where the reservoir is.

16 The reason why is, when they were drilling the
17 two relief wells -- I don't know if everybody remembers this,
18 but they were drilling two holes in the ground, and it was
19 going to take a long time. In order to speed that up, they
08:09 20 wanted to try something called a top hat, which was basically
21 to put a cork in a hose pipe.

22 The fear was that BP had cracked the casing.
23 Now, this is bad because if you have a hose pipe with a bunch
24 of cracks in it and you put a cork in it, it's going to start
08:09 25 to leak. If there are faults, that oil is going to come out of

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08:09 1 those faults and travel up the fault lines, and then you will
2 have three or four oil spills which you could not contain.

3 So they said: We need to, number one, wait
4 another 60 days for the relief well to be drilled and, number
08:09 5 two, we come in here and try and fix it sooner.

6 So the U.S. government and BP came and they said:
7 Please do this for us.

8 Now, this was a tragedy. It is not a survey that
9 we would have ever jumped at doing; however, there is no way we
08:10 10 could say no to doing something like this if we had the
11 technology.

12 So we took a vessel with a couple-mile cable, and
13 we put it in between -- the goal was to shoot three times a day
14 in between these boats. Every night a helicopter came and took
15 that data. Every night it came onshore for 30 days, and they
16 processed it and they made 30 time slots. And once they were
17 confident that the casing was intact, they allowed the top hot
18 procedure to go forward, which allowed the capping of the well
19 sooner.

20 So while this was a horrible incident, I was
21 extremely -- and not what I wanted to be called to do, I was
22 extremely proud we were able to help. I was extremely proud of
23 the crew, and I was extremely proud that we had the equipment
24 and the cable. And the lateral steering was the only way we
08:10 25 could have ever done this survey safely.

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08:10 1 I have one or two other pictures which
2 demonstrate exactly how close the boats were. But for
3 perspective, those two vessels are 400 meters apart. So you
4 have two ships, which were the DD1 and DD2, 400 meters apart.

08:11 5 They were both drilling the relief wells, and they were not
6 allowed to move. Our boat was coming through, I believe, with
7 a 3-kilometer cable, which is 30 football fields long. We are
8 trying to drive this thing through there every day in three
9 different directions. We didn't go every day. We attempted
08:11 10 to.

11 And I think we have one more picture of what the
12 captain actually saw. This was the captain's view out of his
13 window. We put multiple captains on there because we had -- we
14 had multiple captains on the bridge working around the clock.

08:11 15 But this is an example of how much -- what you
16 can do if you actually have control, if you can laterally steer
17 that cable.

18 Q Is this typically the distance that you would get from an
19 obstruction?

08:11 20 A We would never go within -- normally our safety rule says
21 prudence, within 500 meters. To be less than 200 meters is not
22 something we would do.

23 Q Now, is this a 2D, 3D or a 4D survey?

24 A This is a 2D, 4D survey. So we did a bunch of 2D surveys

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08:12 1 Q Why not have more streamers and do 4D?

2 A They simply wouldn't fit in between the vessels. This is
3 just an example of showing how important this -- how you can
4 control a system.

08:12 5 Q Let's talk for a second about more typical jobs than that
6 one. For customers, the benefits from Q-Marine are something
7 they are willing to pay for?

8 A They are.

9 Q How do you know that?

08:12 10 A They regularly -- well, number one, we have become the
11 largest marine seismic company not by choice but by having the
12 best equipment, the best service quality. We are regularly
13 paid a premium for what we do.

14 Q Go ahead.

08:13 15 A And we are -- it has been so successful that we have a plan
16 since day one to convert every single vessel we have to Q and
17 steerable streamer, which is going on.

18 Q Were you in the room yesterday for opening statements?

19 A I was.

08:13 20 Q There was a statement by Mr. Torgerson that WesternGeco
21 still had boats at some point that had conventional streamers
22 that had not been converted over to steerable streamers.

23 Is that the case?

24 A That is true.

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