

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ION GEOPHYSICAL CORPORATION
AND ION INTERNATIONAL S.A.R.L.,

Petitioners

v.

WESTERNGECO LLC

Patent Owner

**PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,080,607
UNDER 35 U.S.C. §§ 311-319 and 37 C.F.R. §§ 42.1-.80, 42.100-.123**

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I. INTRODUCTION

Pursuant to 35 U.S.C. § 311 and 37 C.F.R. § 42.100, ION Geophysical Corporation and ION International S.a.r.l. (collectively, “ION” or “Petitioners”) requests *Inter Partes* review of Claims 1 and 15 of U.S. Patent No. 7,080,607 (the “’607 Patent”) (Ex. 1001), assigned on its face to WesternGeco L.L.C. (“Patent Owner”). This Petition substantively copies the petition filed in co-pending IPR2014-00688, which was instituted on December 15, 2014. Accompanying this Petition is a motion to join IPR2014-00688. For at least the reasons stated herein, Petitioners request that Claims 1 and 15 of the ’607 Patent be judged unpatentable and canceled. Because this Petition substantively copies the petition filed in co-pending IPR2014-00688 and that IPR has been instituted, this Petition establishes a reasonable likelihood Petitioners will prevail with regard to Claims 1 and 15 of the ’607 Patent.

II. OVERVIEW

The ’607 Patent is directed to marine seismic surveying technology. Marine seismic surveys are carried out by vessels that tow acoustic energy sources that fire “shots” of sound waves into the water. The sound waves travel through the seafloor and into the earth, reflect from the earth’s geological formations, and return to the surface. The reflected signals are then recorded by acoustic sensors (“receivers” or “hydrophones”) that are towed in long cables known as seismic

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