

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**BAKER HUGHES INCORPORATED
and
BAKER HUGHES OILFIELD OPERATIONS, INC.,**

Petitioners

v.

PACKERS PLUS ENERGY SERVICES, INC.

Patent Owner

***Inter Partes* Review No. IPR2016-00596**

Patent 7,134,505

PETITION FOR *INTER PARTES* REVIEW UNDER 35 U.S.C. § 312

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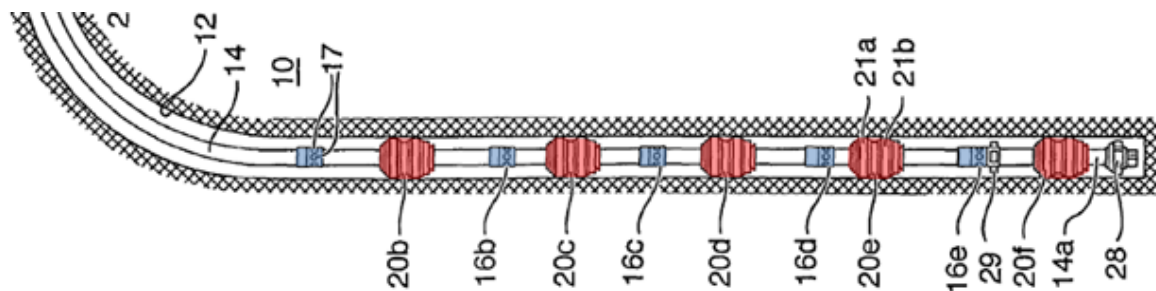
Petitioners' Exhibit List

Exhibit	Description
1001	U.S. Patent No. 7,134,505 (the "'505 Patent")
1002	D.W. Thomson, <i>et al.</i> , <i>Design and Installation of a Cost-Effective Completion System for Horizontal Chalk Wells Where Multiple Zones Require Acid Stimulation</i> , SPE (Society for Petroleum Engineering) 37482 (1997) ("Thomson")
1003	U.S. Patent No. 5,449,039 ("Hartley")
1004	B. Ellsworth, <i>et al.</i> , <i>Production Control of Horizontal Wells in a Carbonate Reef Structure</i> , 1999 Canadian Institute of Mining, Metallurgy, and Petroleum Horizontal Well Conference ("Ellsworth")
1005	U.S. Patent No. 5,375,662 ("Echols")
1006	U.S. Patent 4,018,272 ("Brown")
1007	Declaration of Ali Daneshy, Ph.D.
1008	KATE VAN DYKE, FUNDAMENTALS OF PETROLEUM ENGINEERING (4th ed. 1997)
1009	RON BAKER, A PRIMER OF OIL WELL DRILLING (5th ed. (revised) 1996)
1010	U.S. Patent No. 4,099,563 ("Hutchison")
1011	U.S. Patent No. 6,257,338
1012	Excerpts of Prosecution History of U.S. Patent No. 7,861,774, a continuation of the '505 Patent
1013	Excerpts of Prosecution History of the '505 Patent
1014	U.S. Provisional Application No. 60/404,783
1015	Dictionary Definition from WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY OF THE ENGLISH LANGUAGE UNABRIDGED (1986)
1016	U.S. Patent No. 4,279,306
1017	K.W. Lagrone, <i>et al.</i> , <i>A New Development in Completion Methods</i> , SOCIETY OF PETROLEUM ENGINEERING, Paper 530-PA (1963)
1018	M.J. Eberhard, <i>et al.</i> , <i>Current Use of Limited-Entry Hydraulic Fracturing in the Codell/Niobrara Formations—DJ Basin</i> , SPE (Society for Petroleum Engineering) 29553 (1995)

Pursuant to 35 U.S.C. § 312 and 37 C.F.R. § 42.100 *et seq.*, Baker Hughes Incorporated and Baker Hughes Oil Field Operations, Inc. (“Petitioners”) request *inter partes* review of U.S. Patent No. 7,134,505 (“the ’505 Patent” – Ex. 1001), which issued November 14, 2006. The Board is authorized to deduct any required fees from Norton Rose Fulbright US LLP Deposit Account 50-1212/11508227.

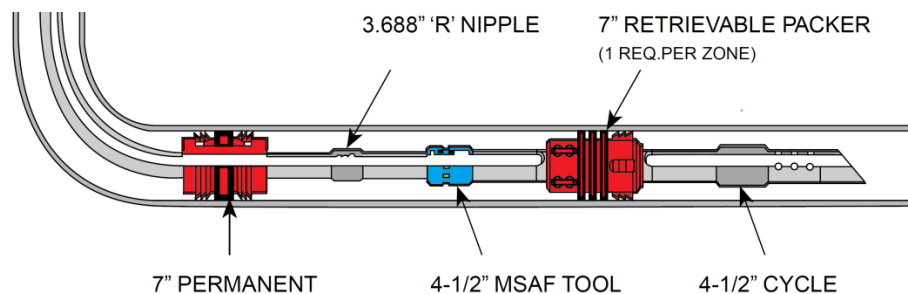
I. INTRODUCTION

The ’505 Patent’s purported invention was a combination of ball-actuated sliding sleeves [blue] and multi-element packers [red] for selectively treating or “stimulat[ing]” zones in an oil well, such as by “frac’ing” or “acidizing.”



But these systems were known before 2001, the earliest claimed priority date.

Petitioners’ primary reference, Thomson, described such a system in 1997:



While Thomson’s figure shows one ball-actuated sliding sleeve [blue] (which it called a “MSAF tool”), its text is clear that “[u]p to 9 MSAF tools [blue] can be

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