## 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

> Case IPR2016-00596 Patent 7,134,505

# EXCLUSIVE LICENSEE RAPID COMPLETIONS LLC'S PRELIMINARY RESPONSE

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# TABLE OF CONTENTS

I.	Intro	roduction1				
II.	Wellbore completion background					
	A.		Vater shut-off completions prevent unwanted fluids from entering a ellbore			
	B.	Well	stimulation is very different than water shut-off7			
	C.	appro	505 patent technology is a nonobvious multistage fluid treatment bach that is an alternative to cased hole plug-and-perf fracturing. 			
	D.		505 patent technology has been praised as "revolutionary" and e-changing."			
III.	Clain	n constructions				
IV.	Petitioners have not established that the challenged claims are unpatentable under any of the proposed grounds					
	A.		nds 1–8—Petitioners fail to establish that Thomson is prior art 			
			nd 3—Petitioners fail to establish that claims 23 and 27 are tentable over Thomson and Ellsworth			
		1.	Applicable law			
		2.	The asserted prior art describes a modified plug-and-perf completion and a water shut-off completion, not open hole multistage fluid treatment			
			a) Thomson is directed to a variation of a plug-and-perf completion			
			b) Ellsworth is directed to a conventional water shut-off completion			
		3.	A person of ordinary skill in the art would not have expected a combination of Thomson and Ellsworth to yield predictable results			

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	4.	Combining Thomson and Ellsworth would alter the "basic principles" of their operation		
C.	Ground 1—Petitioners fail to establish that claims 1–7, 11, 14–22 24–26 are unpatentable over Thomson.			
	1.	Claim 1—Petitioners fail to disclose that Thomson discloses the claimed solid body packer		
	2.	Claim 7—Petitioners fail to show that Thomson discloses the claimed compression ring		
	3.	Claim 19—Petitioners fail to show that Thomson discloses every claim feature		
		a) Petitioners fail to show that Thomson discloses the claimed solid body packer		
		b) Petitioners fail to show that Thomson discloses the claimed hydraulically driven piston		
	4.	Claim 24—Petitioners fail to show that Thomson discloses every claim feature		
D.		Ground 2—Petitioners fail to establish that claim 15 is unpatentable over Thomson and Hartley42		
E.		Ground 4—Petitioners fail to establish that claim 11 is unpatentable over Thomson and Echols		
F.	Ground 5—Petitioners fail to establish that claims 1–7, 11, 14–22, a 24–26 are unpatentable over Thomson and Brown.			
	1.	Claims 1–7, 11, 14–22, and 24–26—Petitioners fail to articulate how the combination of Thomson and Brown discloses or suggests every claim feature45		
	2.	Claims 1–7, 11, 14–22, and 24–26—Thomson teaches away from being combined with Brown		
G.		nd 6—Petitioners fail to establish that claim 15 is unpatentable Thomson, Brown, and Hartley51		

	H.	Ground 7—Petitioners fail to establish that claims 23 and 27 are	
		unpatentable over Thomson, Ellsworth, and Brown	.51
	I.	Ground 8—Petitioners fail to establish that claim 11 is unpatentable	ļ
		over Thomson, Brown, and Echols	.52
V.	Conc	elusion	.53

# **Table of Authorities**

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- iv -

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