

## AFFIDAVIT OF VELMA J'NETTE DAVIS-NICHOLS

1. My name is Velma J'Nette Davis-Nichols. I am the Specialized Product Sales Manager at the world headquarters of Gulf Publishing Company LLC ("GPC") in Houston, Texas. I have worked at GPC since June of 1994.
2. As Specialized Product Sales Manager, I sell certain GPC products, which include trade journals and publications—including World Oil, Hydrocarbon Processing, and Gas Processing—designed for the energy industry. I also manage, and have managed since 2002, the public's access to Gulf's on-site library (the "Library"), which contains, among other things, old copies of some of Gulf's publications, including the Composite Catalog. In performing my duties during the preceding years, I became familiar with GPC's procedure for allowing public access to the Library (discussed below), which did not change in 2002 when I took over.
3. Based on my experience performing my ordinary job duties at GPC, as well as records GPC maintains in the ordinary course of its business that I am personally familiar with through my ordinary job duties, I have personal knowledge of the statements below.
4. GPC's Library includes old copies of the first edition, published in 1929, and each edition thereafter, including the 21<sup>st</sup> edition published in 1955. The last

BAKER HUGHES, A GE COMPANY,  
LLC AND BAKER HUGHES OILFIELD  
OPERATIONS LLC  
Exhibit 1124  
BAKER HUGHES, A GE COMPANY,  
LLC AND BAKER HUGHES OILFIELD  
OPERATIONS LLC v. PACKERS  
PLUS ENERGY SERVICES, INC.

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4. GPC's Library includes old copies of the Composite Catalog, including the first edition, published in 1929, and each edition published since then, including the 21<sup>st</sup> edition published in 1955. The last edition of the Composite Catalog is the

45<sup>th</sup> edition published in 2002. A true and correct copy of the cover and certain pages from Volume 2 of the 21<sup>st</sup> edition of the Composite Catalog in the Library, which includes pages from the Lane-Wells Catalog contained within it, are attached as Appendix A. In the year 2000, any member of the public who wanted to view old copies of the Composite Catalog, including the 21<sup>st</sup> edition, could make an appointment with our Houston office to visit the Library and review what was in it. They would have been free to request copies of the materials we kept there, and we would have made those copies for them for a fee of a few dollars per page.

5. The Library includes a catalog of index cards that show some of the years that certain companies purchased publication space within the Composite Catalog. True and correct copies of the front and back of the index card for the Lane-Wells company are attached as Appendix B. This appendix shows that the Lane-Wells company purchased 20 pages for its catalog that went in the 21<sup>st</sup> edition. Visitors to the Library in 2000 had access to this catalog.

6. The Composite Catalog is and was a compilation of product catalogs from different companies. GPC sold companies the right to include their catalog pages within the Composite Catalog, and GPC sold the Composite Catalog, including the 21<sup>st</sup> edition, to members of the public. True and correct copies of the order form for companies to purchase publishing space in the 21<sup>st</sup> and/or 22<sup>nd</sup> editions of the Composite Catalog are attached as Appendix C.



7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 13, 2017, in Houston, Texas, U.S.A.

By:   
Print: Velma J'Nette Davis-Nichols



# COMPOSITE CATALOG OF OIL FIELD AND PIPE LINE EQUIPMENT

21st 1955-56 Edition

VOLUME 2  
OF THREE VOLUMES

G-N

PUBLISHED BY WORLD OIL



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