

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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BAKER HUGHES INCORPORATED  
and BAKER HUGHES OILFIELD  
OPERATIONS LLC  
Petitioners

WEATHERFORD INTERNATIONAL,  
LLC; WEATHERFORD/LAMB, INC.;  
WEATHERFORD US, LP; and  
WEATHERFORD ARTIFICIAL LIFT  
SYSTEMS, LLC  
Petitioners

v.

v.

PACKERS PLUS ENERGY  
SERVICES INC.,  
Patent Owner

PACKERS PLUS ENERGY  
SERVICES INC.,  
Patent Owner

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Case IPR2016-00596 (Patent 7,134,505)  
Case IPR2016-00597 (Patent 7,543,634)  
Case IPR2016-00598 (Patent 7,861,774)  
Case IPR2016-01380 (Patent 9,303,501)  
Case IPR2016-01496 (Patent 7,134,505)  
Case IPR2016-01505 (Patent 7,543,634)  
Case IPR2016-01506 (Patent 7,861,774)  
Case IPR2016-01509 (Patent 7,861,774)  
Case IPR2016-01514 (Patent 7,543,634)  
Case IPR2016-01517 (Patent 7,134,505)

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**EXCLUSIVE LICENSEE RAPID COMPLETIONS LLC'S REQUEST FOR  
ORAL ARGUMENT**

Exclusive Licensee, Rapid Completions LLC, by and through its attorneys, respectfully requests oral argument, currently scheduled for November 2, 2017.

If the Board determines that live testimony from the parties' declarants will assist the Board, Rapid Completions requests that the oral argument be structured as follows:

- Each side (Weatherford and Baker Hughes are considered a single "side") is permitted ten minutes to make an opening statement.
- Each side is permitted 2-3 hours to divide up as it sees fit between direct, cross, and redirect, etc. of the experts concerning the issues raised in their respective declarations.
- Each side is permitted one hour of oral argument time to address the issues raised in IPR2016-00596, IPR2016-00597, IPR2016-00598, IPR2016-01380, IPR2016-01496, IPR2016-01505 and IPR2016-01506, IPR2016-01509, IPR2016-01514 and IPR2016-01517.

If the Board determines that live testimony from the parties' declarants is not necessary, Rapid Completions requests that the oral argument be structured as follows:

- Each side (Weatherford and Baker Hughes are considered a single "side") is permitted twenty-five minutes to address issues, evidence, and testimony relevant to the proceedings as a whole in an opening

statement.

- Each side is permitted one hour and fifteen minutes of oral argument time to address the issues raised in IPR2016-00596, IPR2016-00597, IPR2016-00598, IPR2016-01380, IPR2016-01496, IPR2016-01505 and IPR2016-01506, IPR2016-01509, IPR2016-01514 and IPR2016-01517.

Pursuant to 37 C.F.R. § 42.70, and without intending to waive any issue not specifically identified, Rapid Completions specifies the following issues to be argued:

1. Petitioners failed to meet their burden of proving that the instituted claims are unpatentable under any grounds in the Petition;
2. Any issues identified in Petitioner's Request for Oral Argument;
3. Any other issues the Board deems necessary for issuing a final written decision.

Rapid Completions requests that the Board provide audio-visual equipment to display demonstrative exhibits, including a projector to be connected to a laptop and a screen for displaying documents.

Dated: September 28, 2017

Respectfully submitted,

*Rapid Completions LLC*

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**CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (e)(4)**

The undersigned hereby certifies that the foregoing document was served electronically via e-mail in its entirety on the following counsel of record for Petitioner:

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Date: September 28, 2017

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