

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)  
Case IPR2016-00597 (Patent 7,543,634)  
Case IPR2016-00598 (Patent 7,861,774)  
Case IPR2016-00656 (Patent 8,657,009)  
Case IPR2016-00657 (Patent 9,074,451)

---

**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 May 18, 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 is permitted ten minutes of attorney argument for an opening statement.
- Each side is permitted 2-3 hours to divide up as each party sees fit between direct, cross, and redirect, etc. of the experts concerning the issues raised in IPR2016-00596, IPR2016-00597, IPR2016-00598.
- Each side is permitted one hour of oral argument time to address the issues raised in IPR2016-00596, IPR2016-00597, IPR2016-00598, IPR2016-00656, and IPR2016-00657.

If the Board determines that live testimony is unnecessary, Rapid Completions requests that each party be granted ninety minutes of oral argument time to address the issues raised in IPR2016-00596, IPR2016-00597, IPR2016-00598, IPR2016-00656, and IPR2016-00657.

Rapid Completions respectfully requests that it be permitted to reserve up to fifteen (15) minutes of its' oral argument time for after Petitioner's reply to highlight issues in petitioner's reply that exceed the proper scope of a reply.

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. Petitioner failed to meet its burden of proving that the instituted claims are unpatentable under any grounds in the Petition;
2. Petitioner's Reply raises issues that go beyond the scope of a proper reply;
3. Any issues identified in Petitioner's Request for Oral Argument;
4. 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: April 14, 2017

Respectfully submitted,

*Rapid Completions LLC*

By /Justin T. Nemunaitis/

Hamad M. Hamad, Reg. No. 64,641

Bradley W. Caldwell (pro hac vice)

Justin T. Nemunaitis (pro hac vice)

CALDWELL CASSADY CURRY, P.C.

2101 Cedar Springs Road, Suite 1000

Dallas, Texas 75201

Telephone: 214.888.4848

2

Facsimile: 214.888.4849  
hhamad@caldwellcc.com  
bcaldwell@caldwellcc.com  
jnemunaitis@caldwellcc.com  
rapid@caldwellcc.com

Dr. Gregory Gonsalves, Reg. No. 43,639  
GONSALVES LAW FIRM  
2216 Beacon Lane  
Falls Church, Virginia 22043  
Telephone: 571.419.7252  
gonsalves@gonsalveslawfirm.com

**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:

Mark T. Garrett (Lead Counsel)  
Eagle H. Robinson (Back-up Counsel)  
NORTON ROSE FULBRIGHT US LLP  
mark.garrett@nortonrosefulbright.com  
eagle.robinson@nortonrosefulbright.com

Date: April 14, 2017

/Hamad M. Hamad/  
Hamad M. Hamad, Reg. No. 64,641