

TABLE OF CONTENTS

I. SUMMARY OF OPINIONS..... 6

II. DECEMBER 1999 ROCKSEAL FEATURES CONCEIVED BY THEMIG AT HALLIBURTON..... 7

A. PACKING ELEMENTS 7

B. ACTUATION DEVICE..... 8

C. LOCKING DEVICE 9

D. ANTI-PRESET 10

E. PACKER BODY 12

III. TOOLS CITED IN THE TRAHAN AFFIDAVIT..... 13

A. WASH TOOLS..... 13

1. Top Tool - U.S. Patent No. 4,279,306..... 15

a) Comparison of Top Tool Wash Tool and RockSeal Features 16

(i) Packing elements 16

(ii) Actuation device..... 16

(iii) Locking device..... 17

(iv) Anti-preset..... 17

(v) Body 18

b) The Top Tool Wash Tool in the StackFrac System 18

2. Baker Model C Packing Element Circulation Washer – U.S. Patent Nos. 4,498,536 and 4,552,218 19

a) Comparison of Baker Model C Packing Element Circulation Washer and RockSeal Features 19

(i) Packing elements	20
(ii) Actuation device.....	20
(iii) Locking device	21
(iv) Anti-preset.....	22
(v) Body	22
b) The Baker Model C Packing Element Circulation Washer in the StackFRAC System	22
3. The Halliburton Selective Injection Packer – U.S. Patent No. 4,569,396.....	23
a) Comparison of Halliburton Selective Injection Packer and RockSeal Features	23
(i) Packing elements	23
(ii) Actuation device.....	24
(iii) Locking device	24
(iv) Anti-preset.....	25
(v) Body	25
b) The Halliburton Selective Injection Packer in the StackFRAC System.....	26
B. MISCELLANEOUS TOOLS.....	26
1. Guiberson G-77 Packer	26
a) Comparison of Guiberson G-77 Packer and RockSeal Features.....	27
(i) Packing elements	27
(ii) Actuation device.....	27
(iii) Locking device	28
(iv) Anti-preset.....	28
b) The Guiberson G-77 in the StackFRAC System	28

2. U.S. Patent No. 5,103,901.....	29
a) Comparison of '901 Patent and RockSeal Features	29
(i) Packing elements	29
(ii) Actuation device.....	30
(iii) Locking device	30
(iv) Anti-preset.....	31
b) The Dresser Packer in the StackFRAC System.....	31
3. D&L Oil Tools DH type packer	32
4. U.S. Patent 2,618,340 (W. E. Lynd).....	32
a) Comparison of '340 Patent Packer and the RockSeal Features.....	34
(i) Packing elements	34
(ii) Actuation device.....	34
(iii) Locking device	34
(iv) Anti-preset.....	34
b) The '340 Patent Packer in the StackFRAC System.....	34
5. Baker Twin Seal Submersible Packer	35
a) Comparison of Twin Seal Submersible Packer and RockSeal Features	35
(i) Packing elements	35
(ii) Actuation device.....	36
(iii) Locking device	37
(iv) Anti-preset.....	37

(v) Body	38
b) The Baker Twin-Seal Packer in the StackFRAC system	38
IV. THE ROCKSEAL INVENTION IS AN "INVENTION" UNDER THEMIG'S CONTRACTS	39
V. THE ROCKSEAL INVENTION IS A PATENTABLE INVENTION	41
VI. AT LEAST ONE CLAIM IN THE '505 PATENT AND '863 APPLICATION REQUIRES THE ROCKSEAL INVENTION.....	43

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.