

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 IPR2016-01506  
Patent 7,861,774

---

**EXCLUSIVE LICENSEE RAPID COMPLETIONS LLC'S  
OBJECTIONS TO PETITIONERS' EVIDENCE PURSUANT  
TO 37 C.F.R. § 42.64(b)(1)**

***Mail Stop "PATENT BOARD"***  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

Under the Federal Rules of Evidence and 37 C.F.R. § 42.64, Exclusive Licensee Rapid Completions LLC timely objects to evidence submitted with the Petitioners' Reply. Rapid Completions serves Petitioners with these objections to provide notice that Rapid Completions may move to exclude the challenged exhibits under 37 C.F.R. § 42.64(c) unless Petitioners cure the defects associated with the challenged exhibits identified below.

**Exhibit 1024 – Davis-Nichols Affidavit**

Rapid Completions objects to this document as irrelevant under FRE 401 and thus inadmissible under FRE 402 and 403, and untimely because it attempts to add new matter beyond the instituted grounds.

Dated: August 23, 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  
Facsimile: 214.888.4849  
[hhamad@caldwellcc.com](mailto:hhamad@caldwellcc.com)  
[bcaldwell@caldwellcc.com](mailto:bcaldwell@caldwellcc.com)  
[jnemunaitis@caldwellcc.com](mailto:jnemunaitis@caldwellcc.com)  
[rapid@caldwellcc.com](mailto: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](mailto:gonsalves@gonsalveslawfirm.com)

**CERTIFICATION OF SERVICE**

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](mailto:mark.garrett@nortonrosefulbright.com)  
[eagle.robinson@nortonrosefulbright.com](mailto:eagle.robinson@nortonrosefulbright.com)

Date: August 23, 2017

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