

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, INC.,  
Petitioners

v.

PACKERS PLUS ENERGY SERVICES INC.,  
Patent Owner

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Case IPR2016-01496 (Patent 7,134,505)  
Case IPR2016-01505 (Patent 7,543,634)  
Case IPR2016-01506 (Patent 7,861,774)

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**PATENT OWNER'S NOTICE TO THE BOARD**

On March 9, 2017 the Board requested that Rapid Completions LLC inform the Board as to whether 1) it desires live testimony in cases IPR2016-00596, IPR2016-00597, IPR2016-00598, IPR2016-00650, IPR2016-00656, and IPR2016-00657; and 2) it wishes to withdraw its opposition to Petitioner's joinder motion. Rapid Completions sets forth its positions below:

(1) Rapid Completions requests an opportunity to present live testimony in IPR2016-00596, IPR2016-00597, and IPR2016-00598. To the extent the Board maintains the May 18<sup>th</sup> trial date, Rapid Completions specifically requests that each side be permitted an opportunity to call its expert declarant.

(2) Rapid Completions withdraws its opposition to Baker Hughes' joinder motions, provided that joinder would result in a single trial for all currently pending IPRs related to the '505, '634, and '774 patents. If joinder would result in multiple trials for these patents, Rapid Completions remains opposed to joinder. In addition, Rapid Completions remains opposed to joinder if the Board grants its motions for reconsideration with regard to the institution decisions in IPR2016-01509, IPR2016-01514, and IPR2016-01517 (the "Weatherford IPRs"), but denies its motions for reconsideration with regard to IPR2016-01496, IPR2016-01505, and IPR2016-01506 (the "Baker Follow-On IPRs").<sup>1</sup>

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<sup>1</sup> Rapid Completions maintains that the Baker Follow-On IPRs are improper serial petitions that would need to be terminated pursuant 35 U.S.C. § 315(e)(1) if the Board were to reach a final decision in IPR2016-00596, IPR2016-00597, and IPR2016-00598. Accordingly, if the Board terminates the Weatherford IPRs, but

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Respectfully submitted,

*Rapid Completions LLC*

By /Hamad M. Hamad/

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)

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maintains the Baker Follow-On IPRs, then Rapid Completions requests that the Board maintain the May 18<sup>th</sup> trial date in IPR2016-00596, IPR2016-00597, and IPR2016-00598. Once the Board reaches a final decision in those proceedings, it may then terminate the Baker Follow-On IPRs pursuant to § 315(e)(1) without the burden and expense of a trial in those proceedings.

## 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: March 14, 2017

/Hamad M. Hamad/

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