

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)**

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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' Petition for Inter Partes Review. 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 1002—Kieckhefer Affidavit

To the extent Petitioners rely on the contents of this document for the truth of the matter asserted (for example, to establish public accessibility as a printed publication), Rapid Completions objects to such contents as inadmissible hearsay under FRE 801 and 802. And Rapid Completions objects to this document as irrelevant under FRE 401 and thus inadmissible under FRE 402, or as confusing or a waste of time under FRE 403 because this document is inadmissible under FRE 801, 802, and 901 as explained above.

Exhibit 1003—Ellsworth

To the extent Petitioners rely on the contents of this document for the truth of the matter asserted (for example, to establish public accessibility as a printed publication), Rapid Completions objects to such contents as inadmissible hearsay under FRE 801 and 802.

Rapid Completions also objects to this document as not properly authenticated under FRE 901 because Petitioners have not presented sufficient evidence that the document is authentic nor that the document is self-authenticating under FRE 902.

And Rapid Completions objects to this document as irrelevant under FRE 401 and thus inadmissible under FRE 402, or as confusing or a waste of time under FRE 403 because this document is inadmissible under FRE 801, 802, and 901 as explained above.

Exhibit 1005 - Daneshy Declaration

Rapid Completions objects to the Daneshy Declaration under FRE 702 and 703 as Petitioners have failed to show that Dr. Daneshy is qualified to offer each of the opinions in the declaration or that he was apprised of the relevant legal standards. *See, e.g.*, IPR2016-00598, Paper 26 at 48-51.

Exhibit 1006—Kate Van Dyke, Fundamentals of Petroleum Engineering

To the extent Petitioners rely on the contents of this document for the truth of the matter asserted (for example, to establish public accessibility as a printed publication), Rapid Completions objects to such contents as inadmissible hearsay under FRE 801 and 802.

And Rapid Completions objects to this document as irrelevant under FRE 401 and thus inadmissible under FRE 402, or as confusing or a waste of time under

FRE 403 because this document is inadmissible under FRE 801, 802, and 602 as explained above.

Exhibit 1007—Ron Baker, A Primer of Oil Well Drilling

To the extent Petitioners rely on the contents of this document for the truth of the matter asserted (for example, to establish public accessibility as a printed publication), Rapid Completions objects to such contents as inadmissible hearsay under FRE 801 and 802.

And Rapid Completions objects to this document as irrelevant under FRE 401 and thus inadmissible under FRE 402, or as confusing or a waste of time under FRE 403 because this document is inadmissible under FRE 801, 802, and 602 as explained above.

Exhibit 1014—Declaration of Christopher Hawkes and Horizontal Well

Technology Conference Materials

To the extent Petitioners rely on the contents of this document for the truth of the matter asserted (for example, to establish public accessibility as a printed publication), Rapid Completions objects to such contents as inadmissible hearsay under FRE 801 and 802.

Rapid Completions further objects to the document for lack of foundation. Petitioner has not shown that the declarant has personal knowledge of the subject matter of the testimony as required by FRE 602.

And Rapid Completions objects to this document as irrelevant under FRE 401 and thus inadmissible under FRE 402, or as confusing or a waste of time under FRE 403 because this document is inadmissible under FRE 801, 802, and 602 as explained above.

Exhibit 1015—Eberhard Article

To the extent Petitioners rely on the contents of this document for the truth of the matter asserted (for example, to establish public accessibility as a printed publication), Rapid Completions objects to such contents as inadmissible hearsay under FRE 801 and 802.

And Rapid Completions objects to this document as irrelevant under FRE 401 and thus inadmissible under FRE 402, or as confusing or a waste of time under FRE 403 because this document is inadmissible under FRE 801, 802, and 602 as explained above.

Exhibit 1016—Declaration of Nancy Chaffin Hunter

To the extent Petitioners rely on the contents of this document for the truth of the matter asserted (for example, to establish public accessibility as a printed publication), Rapid Completions objects to such contents as inadmissible hearsay under FRE 801 and 802.

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