

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WEATHERFORD INTERNATIONAL, LLC;
WEATHERFORD/LAMB, INC.;
WEATHERFORD US, LP; and WEATHERFORD
ARTIFICIAL LIFT SYSTEMS, LLC
Petitioners

v.

PACKERS PLUS ENERGY SERVICES INC.,
Patent Owner

Case IPR2016-01509
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 1007—Declaration of Vikram Rao

Rapid Completions objects to this document under FRE 702 as Rapid Completions has not yet had an opportunity to depose Mr. Rao to properly assess his opinions under the *Daubert* standard.

Exhibit 1008—Transcript of Daniel Themig – 01/08/2007

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 1011—Affidavit of Ken Trahan

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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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 1012—Expert Report of Kevin Trahan

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 1013—First Supplemental Report of Kevin Trahan

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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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 1014—Supplemental Engineering Report Prepared By Ronald

Britton, P.E.

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.

Dated: March 8, 2017

Respectfully submitted,

Rapid Completions LLC

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