

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

PACKERS PLUS ENERGY SERVICES INC.,  
Patent Owner

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Case IPR2016-01509  
Patent 7,861,774

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**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 1035—Rao Reply Declaration**

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.

**Exhibit 1036—Overbey Report**

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.

**Exhibit 1037 Carden Declaration**

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.

**Exhibit 1040—Overbey Article, SPE 18249**

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.

**Exhibit 1042—Journal of Canadian Petroleum Technology**

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.

**Exhibit 1043- Rock Mechanics**

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

bcaldwell@caldwellcc.com  
[jnemunaitis@caldwellcc.com](mailto:jnemunaitis@caldwellcc.com)  
rapid@caldwellcc.com

Dr. Gregory Gonsalves, Re. No.  
43,639  
GONSALVES LAW FIRM  
2216 Beacon Lane  
Falls Church, Virginia 22043  
Telephone: 571.419.7252  
gonsalves@gonsalveslawfirm.com

**CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (e)(4)**

The undersigned hereby certifies that the foregoing document was served via electronic mail, as previously consented to by Petitioner upon the following counsel of record:

Jason Shapiro (Lead Counsel)  
Patrick Finnan (Back-up Counsel)  
EDEL,SHAPIRO & FINNAN, LLC  
[js@usiplaw.com](mailto:js@usiplaw.com)  
[pjf@usiplaw.com](mailto:pjf@usiplaw.com)  
[epatent@usiplaw.com](mailto:epatent@usiplaw.com)

Date: August 23, 2017

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