

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  
MOTION TO EXCLUDE**

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

Exclusive Licensee Rapid Completions LLC moves to exclude the following exhibits and testimony pursuant to Rule 42.64:

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

**Objections:** (1) Authentication – Federal Rule of Evidence (“FRE”) 901(a); (2) Hearsay – FRE 801(c), 802.

**Location of prior objections:** Paper 26 at 2-3.

**Locations exhibit is relied upon by RC:** Petition at 17-18.

**Explanation:** Weatherford has not offered evidence that the documents are authentic. To the extent Weatherford relies on the declaration of their paralegal Carrie Anderson, they must establish a foundation that would enable her to competently testify about the exhibit’s authenticity. Moreover, Weatherford relies on these documents for the truth of the matters asserted, and thus, they are hearsay. However, Weatherford has not asserted any hearsay exception that renders them admissible.

**Exhibit 1011—Affidavit of Ken Trahan**

**Objections:** (1) Authentication – Federal Rule of Evidence (“FRE”) 901(a); (2) Hearsay – FRE 801(c), 802.

**Location of prior objections:** Paper 26 at 3.

**Locations exhibit is relied upon by RC:** Petition at 18.

**Explanation:** Weatherford has not offered evidence that the documents are authentic. To the extent Weatherford relies on the declaration of their paralegal Carrie Anderson, they must establish a foundation that would enable her to competently testify about the exhibit's authenticity. Moreover, Weatherford relies on these documents for the truth of the matters asserted, and thus, they are hearsay. However, Weatherford has not asserted any hearsay exception that renders them admissible.

**Exhibit 1012—Expert Report of Kevin Trahan**

**Objections:** (1) Authentication – Federal Rule of Evidence (“FRE”) 901(a); (2) Hearsay – FRE 801(c), 802.

**Location of prior objections:** Paper 26 at 3-4.

**Locations exhibit is relied upon by RC:** Petition at 19 and 55.

**Explanation:** Weatherford has not offered evidence that the documents are authentic. To the extent Weatherford relies on the declaration of their paralegal Carrie Anderson, they must establish a foundation that would enable her to competently testify about the exhibit's authenticity. Moreover, Weatherford relies on these documents for the truth of the matters asserted, and thus, they are hearsay. However, Weatherford has not asserted any hearsay exception that renders them admissible.

**Exhibit 1013—First Supplemental Report of Kevin Trahan**

**Objections:** (1) Authentication – Federal Rule of Evidence (“FRE”) 901(a); (2) Hearsay – FRE 801(c), 802.

**Location of prior objections:** Paper 26 at 4-5.

**Locations exhibit is relied upon by RC:** Petition at 19.

**Explanation:** Weatherford has not offered evidence that the documents are authentic. To the extent Weatherford relies on the declaration of their paralegal Carrie Anderson, they must establish a foundation that would enable her to competently testify about the exhibit’s authenticity. Moreover, Weatherford relies on these documents for the truth of the matters asserted, and thus, they are hearsay. However, Weatherford has not asserted any hearsay exception that renders them admissible.

**Exhibit 1014—Supplemental Engineering Report Prepared By Ronald**

**Britton, P.E.**

**Objections:** (1) Authentication – Federal Rule of Evidence (“FRE”) 901(a); (2) Hearsay – FRE 801(c), 802.

**Location of prior objections:** Paper 26 at 5.

**Locations exhibit is relied upon by RC:** Petition at 20.

**Explanation:** Weatherford has not offered evidence that the documents are authentic. To the extent Weatherford relies on the declaration of their paralegal Carrie Anderson, they must establish a foundation that would enable her to

competently testify about the exhibit's authenticity. Moreover, Weatherford relies on these documents for the truth of the matters asserted, and thus, they are hearsay. However, Weatherford has not asserted any hearsay exception that renders them admissible.

Dated: September 28, 2017

Respectfully submitted,

*Rapid Completions LLC*

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