

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 MOTION
TO WITHDRAW AS COUNSEL AND SUBSTITUTE NEW COUNSEL**

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P.O. Box 1450
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I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(e), and as authorized by the Board in an e-mail dated October 5, 2016, current counsel for Exclusive Licensee Rapid Completions LLC respectfully requests authorization to withdraw Michael B. Ray, Lori A. Gordon, Kyle Conklin, and Steven Peters as counsel, and substitute Hamad M. Hamad as lead counsel and Dr. Gregory J. Gonsalves, Bradley W. Caldwell (subject to *pro hac vice* admission), and Justin T. Nemunaitis (subject to *pro hac vice* admission) as back-up counsel in this proceeding.

Patent Owner has conferred with Petitioners' counsel. Petitioners do not oppose this motion.

II. STATEMENT OF REASONS FOR SUBSTITUTION OF COUNSEL

Rapid Completions wishes to designate new lead counsel, Hamad M. Hamad (Registration No. 64,641) and to designate new back up counsel Dr. Gregory J. Gonsalves (Registration No. 43,639), Bradley W. Caldwell (motion for *pro hac vice* admission to be filed), and Justin T. Nemunaitis (motion for *pro hac vice* admission to be filed) to represent Rapid Completions going forward in this proceeding.

Rapid Completions' new lead counsel and back up counsel Mr. Gonsalves meet the requirements of 37 C.F.R. § 42.10(c) as registered practitioners. Motions for *pro hac vice* admission of Mr. Caldwell and Mr. Nemunaitis will be filed shortly after this motion. Mr. Caldwell and Mr. Nemunaitis are attorneys representing Rapid

Completions in pending district court litigation concerning the infringement of the '774 patent. Mr. Caldwell's and Mr. Nemunaitis's qualifications, as required for *pro hac vice* admission, will be stated in the forthcoming motions for *pro hac vice* admission and supporting declarations.

A decision on whether to institute this *inter partes* review has not yet issued, and no extensions of time will be needed upon grant of this Motion. Furthermore, it is believed that granting this Motion will not hinder the economy, the integrity of the patent system, the efficient administration of the Office, or the ability of the Office to timely complete this proceeding. *See* 35 U.S.C. § 316(b).

A new executed Power of Attorney is being filed concurrently.

Updated Mandatory Notices Under 37 C.F.R. § 42.8(b)(3) and (b)(4) will be filed upon grant of the present motion.

Respectfully submitted,
STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

/Michael B. Ray/

Michael B. Ray
Registration No. 33,997
Attorney for Exclusive Licensee

Date: October 6, 2016

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that the foregoing EXCLUSIVE LICENSEE RAPID COMPLETIONS LLC'S MOTION TO WITHDRAW AS COUNSEL AND SUBSTITUTE NEW COUNSEL and accompanying Power of Attorney were served electronically via e-mail on October 6, 2016, in their entirety on the following counsel of record for Petitioner:

Jason Shapiro (Lead Counsel)
Patrick Finnan (Back-up Counsel)
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/Michael B. Ray/

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Date: October 6, 2016

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